

MORENCI, MICHIGAN 49256, PHONE (313) 458-2224

June 18, 1974

Dept. of Natural Resources Water Resources Commission Pointe Mouillee State Game Area R.F.D. #2 Rockwood, Michigan 48173 RECEIVED

JUN 1 9 1974

DEPT. OF NATURAL RESOURCES
PTE. MOUILLEE S. G. A.

Attn: Mr. John Bohunsky, Reginal Engineer

Mr. Wayne E. Denniston, P.E. Mr. Roy E. Schrameck, P.E.

Gentlemen:

Thank you for your letter of May 10, 1974 concerning the accidental spillage at our Morenci plant.

We are happy to report that the new sewer line was completed by June 15, 1974 and the emergency overflow line to the creek has been permanently plugged with concrete. We now flow all wastes to our combined waste sump, as shown on the sketch attached to my letter dated April 19, 1974.

We anticipate no more difficulties and are also taking steps within our process to eliminate operator error as you discussed.

Unless I hear from you I shall consider this file closed. Thank you.

Very truly yours

Richard G. Speed, P.E. Manager of Plant and Industrial Engineering

ichard J. Greed

RGS/jh

cc: R. Dube

J. Wilkenfeld

A. Katona

MES TO THE COMPANY

Lansing, Michigan 48926

MORENCI, MICHIGAN 49256, PHONE (313) 458-2224

April 19, 1974

Water Resources Commission Department of Natural Resources Steven T. Mason Bldg., 8th Floor APR 25/674
Vator qual Could

Attn: Robert Courchaine, Chief Engineer

Gentlemen:

The attached report and sketch detail an emergency spillage which occured at our Morenci, Michigan plant on April 18, 1974 at 10:30AM. As stated in the report this was the result of an operator error in overfilling a storage tank. Through a combination of circumstances a spill of approximately 800 gallons of a dilute solution containing sodium phosphate, sodium carbonate and small amounts of zinc phosphate occurred.

We have since cleaned out the sump to keep the existing sump pump operable as shown on the sketch. We have a new sewer line ordered which will eliminate the present pumping requirement, and we believe this will correct any deficiencies. The overflow line to the river will then be permanently capped.

On the afternoon of April 18, 1974, Messrs. R. Schrameck and C.C. Bikfaloy of the Water Resources Commission visited the plant site and were given a tour of the area. We explained the situation to their satisfaction and they indicated agreement with our plan.

Very truly yours

Richard G. Speed, P.E. Manager of Plant and Industrial Engineer

RGS/jh

cc: R. Dube

J. Wilkenfeld

A. Katona

Attachment

K: WED

THE PARKER COMPANY ACCIDENTAL SPILLAGE REPORT

DATE 4-18-74

LOCATION Morenci, Michigan Plant

PERSON REPORTING Richard G. Speed, Manager of Plant and Industrial Engineering

DECRIPTION AND CAUSE OF SPILL(s) Operator overfilled tank which flushed into sump overfilling sump. Emergency overflow went to The Tiffin River (Bean Creek) causing white precipitate of soda ash and some dilute zinc phosphate.

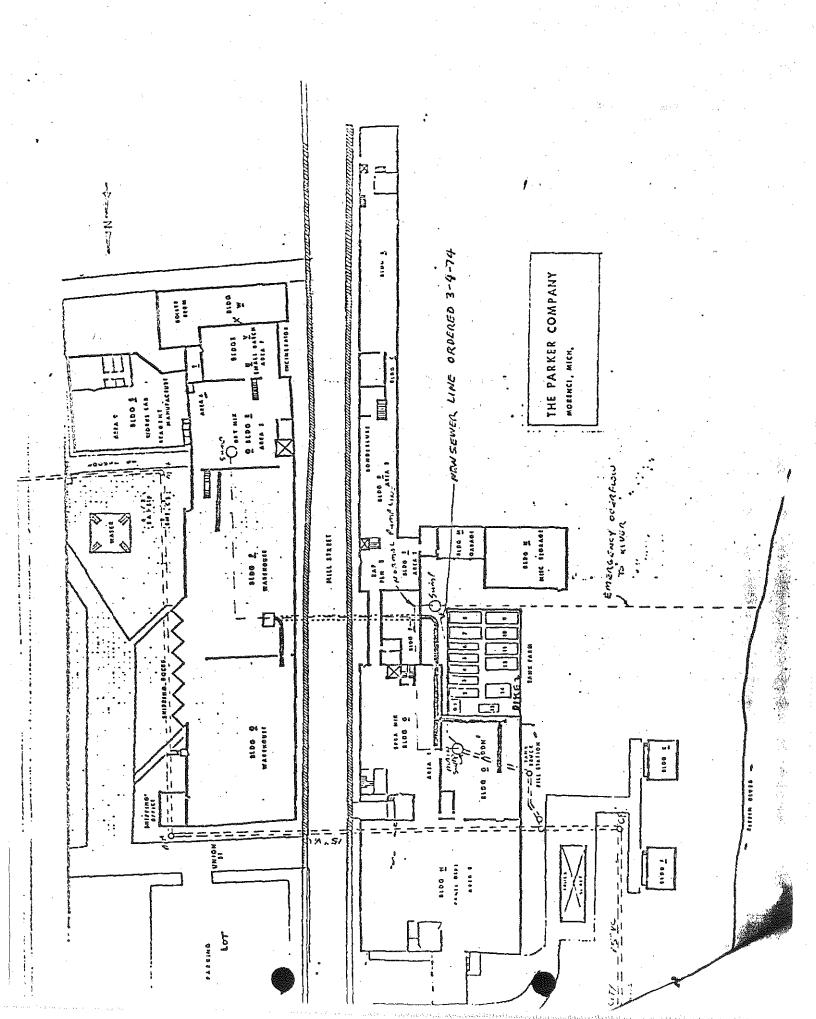
ESTIMATE OF SPILLED QUANTITIES (LBS) 800 gallons dilute sodium carbonate and phosphate in water slurry.

ACTION TAKEN TO ABATE POLLUTION Installing new sewer line to main collection sump.

AGENCIES CONTACTED IN REGARD TO ACCIDENTAL SPILL Frank Baldwin (TEL: 571-373-1947)
Regional Water Quality Administrator
Department of National Resources
District No.1
Rockwood, Michigan

A. Katona Environmental Health Hooker Chemical Niagara Falls, N. Y. 14302

rameck and C.C. Bikfaloy - Viewed site on 4-18-74 sources Commission tof Natural Resources



Memorandum

To:

W. Denniston

From:

R. Schrameck

Date:

4-18-74

SUBJECT:

Zinc Phosphate loss to

Landin

Bean Creek Parker Company

Morenci

Chuck Bikfalvy and the writer received a call in Adrian from Wayne Denniston, District Engineer, at about 1345 on this date that the Parker Company in Morenci had accidentally lost an unknown quantity of zinc phosphate, sodium phosphate and acid to Bean Creek. The Company discovered the loss about 1030 and as soon as they ascertained the material might reach Bean Creek, they activated their incident plans and notified Lansing at about 1055. Mr. Richard Speed, Manager of Plant and Industrial Engineering, attempted to contact Messrs. Bohunsky or Baldwin but they were not available. He left a message that the Company had an accidental spill to the Creek but due to faulty communications his call was not returned until sometime after 1300.

We proceeded to Morenci immediately and checked Bean Creek at Morenci Highway in Morenci. The creek appeared normal and had a litmus paper pH of about 7. There were no signs of dead or dying fish in the area.

Mr. Speed relayed the following information about the incident.

The Parker Company, a Division of Oxy Metal Finishing Corporation, formulates surface conditioners such as cleaners and phosphate coaters for the metal finishing industry. They have about five heated mixing-storage tanks for zinc phosphate in the basement of one of their buildings. An operator overfilled one of these tanks by about 800 gallons and the material flowed over the floor to a drain and then to an outside collection sump. The volume of material exceeded the capacity of the lift pump in the collection sump and flowed to the creek via an old cracked roof header drain. This sump normally collects waste waters from surrounding sections of the plant and storm water and conveys it to the main collection sump by use of the sump pump. All process and cooling waters, as well as storm water run off from the plant area, is normally discharged to the municipal sanitary system and on to the Morenci sanitary lagoon system.

Mr. Speed indicated that the sump contained sodium carbonate, lime and sodium hydroxide. He felt that when the hot zinc phosphate hit the cold water solution in the sump that the zinc probably dropped out and the pH was nearly neutralized. The quantity of sludge they had to remove from the sump verified this theory to him. He indicated that the material discharged to the creek was a white turbid flow and felt that it would be primarily calcium phosphate and/or sodium phosphate. He had no idea how much of the 800 gallons actually reached the creek.

To:

W. Denniston

From:

R. Schrameck

Date:

4-18-74

SUBJECT:

Zinc Phosphate loss to

Bean Creek
Parker Company

Morenci

There was no discharge from the creek outfall when we arrived.

Mr. Speed showed us a purchase order written on 3-4-74 to install a gravity sewer from the sump in question to the main collection sump thereby eliminating the pump. He also said he would plug the old sewer going to the creek. They have apparently been waiting on the contractor to install the necessary sewer connection. This should eliminate this type of incident in the future. Mr. Speed was advised that he must file a written report with the Commission within ten days and that he should indicate the pending construction in this report.

After leaving the plant, we checked the bridge crossings on Bean Creek for a distance of about five miles downstream. Although the turbidity in the stream seemed to increase slightly downstream, there was no discernible pH variation and no indication of any dead or distressed fish in the creek.

Mr. Speed told us that shortly after he called Lansing, people were observed sampling Bean Creek at Morenci Highway. It appears that this may have been the sampling crew from Comprehensive Studies, and this data will be checked when available to determine if any changes in water quality were noted.

No further action is indicated on the part of staff at this time.

cc: John Bohunsky

RS:gm

NATURAL RESOURCES COMMISSION

E. M. LAITALA Chairman CARL T. JOHNSON HILARY F. SNELL HARRY H. WHITELEY CHARLES G. YOUNGLOVE

STATE OF MICHIGAN



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, LANSING, MICHIGAN 48926

A. GENE GAZLAY, Director

RFD #2 Rockwood, Michigan 48173

Pointe Mouillee State Game Area May 10, 1974

Mr. Richard G. Speed Manager of Plant and Industrial Engineer The Parker Company Monrenci, Michigan 49256

Dear Mr. Speed:

Receipt of your April 19, 1974 incident report is hereby acknowledged. We would like to thank you for your immediate attention to notification of our agency and submittal of your incident report.

The corrections outlined in your report and cover letter should adequately prevent this type of loss from reaching Bean Creek in the future. We would request correspondence from you indicating when the new sewer line is installed and when the by-pass line to the river has been plugged. We would hope that as the contract on your new sewer was let on March 4, 1974, that sufficient pressure can be exerted on the local contractor so that the line is installed by no later than July 1, 1974.

In addition to your proposed corrections, we would suggest that you consider the possibility of high-level alarms on your mixing tanks or possibly interconnect overflows among your tanks so as to utilize all available storage in the event another overfill does occur. This would serve to give added protection to the Company and municipal sewer systems in the event of a future mishap.

If you should have any questions regarding this correspondence, please feel free to contact this office, or Mr. John Bohunsky, Regional Engineer, in our Lansing office.

Yours Truly,

WATER RESOURCES COMMISSION

Wayr E. Denniston, P.E.

h Engineer

M. Schrameck, P.E.

Assistant Basin Engineer

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es: John Bohunsky 33:3m

WATER RESOURCES COMMISSION

JOHN P. WOODFORD Chairman

ALVIN R. BALDEN Vice Chairman

CHARLES D. HARRIS

JOHN E. VOGT

STANLEY QUACKENBUSH

THOMAS F. JAMES

JOHN H. KITCHEL, M.D.

H ST-ag)

MICHIGAN WATER RESOURCES COMMISSION

Memorandus

To: Front and Files

Frant G. Calhoun

Date: 9-15/64

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Re: Hooker Chanical

Parker Rust Proof Div.

Mornel

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bmc cc=-G. Calhoun

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MICHIGAN WATER RESOURCES COMMISSION Memorandum Total F. B. Frost and G. Calhoun From the R. W. Purdy Dute: July 27, 1964 Report of Fish Kill In Bean Creek at Morenci attended to contact Ar. Lierk loss of the Ohio Division and Art his office. I talked to Mr. Appear of the Ohio Division (III) (for at the Columbus Office. He had very little additional later and in a had referred be to the Findley Office. I contacted the District Supervisor of the Findley Office. ites to contact Mr. Clark late in the afternoon of July 23 but det his office. I talked to Mr. Appear of the Ohio Bivision Nation State land, the District Supervisor of the Findley Office.

As reported that they first received information of dead fish in Bean Great in the morning of July 23. A farmer living near the Subjection line reported the fish kill to their District Came Fratection Branch. Investigation disclosed the probable time of the That hill de July 17. fish were noted in all points of the stream. At appeared that was 200 yards from the Ohio line. It was their investigators epinion that the killing was caused by a toxic waste from what they believe to be a wire manufacturing company in Morenci. A complete report of their investigation will be forwarded to this office. investigation should be made to determine if waste control is needed at any of the industries in Morenci. A municipal sewage treatment facility is now under construction.

James A. Rhodes Governor

Fred E. Morr Department Director







Dale E.

Jack F. K

Carl L. Mo Adm. Ass



DIVISION OF WILDLIFE DEPARTMENT OF NATURAL RESOURCES

July 24, 1964



RECEIV

JUL 27 196

WATER RESOUR

Mr. Ralph Purdy Michigan Water Resources Commission Station B Lansing, Michigan

Dear Mr. Purdy:

On July 23, 1964, by public service, I advised that I would forward a copy of our game protector's investigation report on his pollution investigation in Beaver Cree in Fulton County, Ohio this date. Mr. Marvin Rittenhouse, our Fulton County Game Protector, has had to delay this report due to his incapacitation resulting from a broken arm sustained during his investigation. In order to provide you information at the earliest possible date, I have summarized our knowledge of this pollution as follows:

Mr. Dale Johnson, a rural resident of Fulton County, Ohio, located within one mile of the Ohio-Michigan line on Fulton County Road "T", advised Mr. Rittenhouse on July 22, 1964, that he had observed dead fish and other fish in distress in Beaver Creek on his property on Saturday, July 18, 1964. At the time of his investigation on July 22, Mr. Rittenhouse found no dead fish in Ohio. However, upstream observation indicated the presence of dead fish in the stream in Michigan. Mr. Rittenhouse found that dead fish were present to the outlet drain of the Parker Rust Proof Division of Hooker Chemical Corporation at Morenci, Michigan. He obtained five water samples from the stream at different locations and a sample from the drain of this corporation These samples have been taken to our laboratorics in Columbus for analysis. This analysis information can be provided to you as soon as available.

A similar fish kill in this stream was reported by Mr. Dale Johnson and investigated by Marvin Rittenhouse and Carl Baker, one of our fisheries biologists on June 24, 1963 During this investigation, it was found that dead fish were present both in Ohio and Michigan and it was determined at this time that the source was the Hooker Chemical Corporation. During this investigation, a Mr. Robert Sallows of a Morenci rural address was contacted and he advised that the company appears to place wastes into the stream on Tuesdays and Thursdays. He also advised that once a year usually during mid-summer, they apparently clean their facilities and place large quantities of waste materials into the stream.

It is hoped that this information will be of assistance to yer. As soon as more detailed information is available, we will be pleased to provide it to you.

Sincarely yours,

Darrell Allison
Pish Management Supervisor
Wildlife District Two
957 Line Lyanua

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PRC Environmental Management, Inc 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118

HST-005



RCRA TREATMENT, STORAGE, AND DISPOSAL FACILITIES CORRECTIVE ACTION PRIORITIZATION

FINAL REPORT

ATTACHMENT 1

CUMULATIVE SCORING SUMMARY FOR 1,696 FACILITES

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No. : R05001

EPA Region : 5
Site No. : Various

Date Prepared : September 30, 1994

Contract No. : 68-W4-0007
PRC No. : 070-R0500101PR

Prepared by : PRC Environmental

Management, Inc.
Contractor Project Manager : Shin H. Ahn

Telephone No. : 312/856-8700
EPA Work Assignment Manager : Kevin Pierard

Telephone No. : 312/886-4448

HENKEL CORPORATION, PARKER AND AMCHEN (MID 058 723 867)

Henkel Corporation, Parker and Amchen, formerly Parker Surface Treatment Products, produces metal-treating chemicals. The facility is located in Morenci, Michigan, and has been in operation since 1928. Extensive site contamination has been documented, probably as the result of improperly stored drums. These drums were removed in 1982. The facility is presently permitted to store 15,000 gallons in containers (S01) of D001, D002, D003, and D007 listed wastes. Henkel has submitted a closure plan for their container storage area.

The groundwater route was scored based on limited data indicating the presence of heavy metals such as lead, zinc, and cyanide in the aquifer of concern. The metals were contained in improperly stored, leaking drums. The groundwater is the drinking water source and wells are located 50 yards from the site.

Henkel does not maintain an NPDES permit. Heavy metals and PCBs were detected in Bean Creek, which runs along the site boundary. The contamination detected in the creek was probably the result of reported leaking barrels. The use of Bean Creek for recreation is assumed. The distance to a sensitive environment is greater than 2 miles from the site.

No observed release was scored for the air route. The facility does have an air operating permit. However, no permit violations have been documented. Drums located outdoors did not have covers and because baghouse dust fiber packs were strewn across the property. Several organics are stored in these drums. Residences are located within 1/4 mile of the facility.

On-site contamination from PCB and heavy metals was observed. The access to this site is unrestricted.

References:

Parker Chemical Co. 1988. Revised Closure Plan. May 12.

MDNR. 1985. CERCLA PA of Parker Surface Treatment Products, Morenci, Michigan.

EPA. 1990. RCRA Part A Permit and Compliance Files.

PRC. 1994. "NCAPS Information Request - Michigan." Received by Facsimile from MDNR on February 14.

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

HENKEL CORP. PARKER AND AMCHEN

EPA SITE NUMBER: MID 058723867

MORENCI, MI

SCORED BY: DONNA STROKA/ NICK NIGRO

OF PRC EMI

ON 03/18/94

GROUNDWATER SCORE: 88.46

SURFACE WATER SCORE: 60.23

AIR ROUTE SCORE: 20.66

ONSITE SCORE: 85.71

MIGRATION SCORE: 69.33

EPA ID NO.: MID 058723867 HENKEL CORP. PARKER AND AMCHEN

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.): NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD

TOXICITY/PERSISTANCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0

DRUMS : 2163

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.4

EPA ID NO. : MID 058723867 HENKEL CORP. PARKER AND AMCHEN

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? Y

IS THERE A PERMITTED OUTFALL?

HAVE THERE BEEN PERMIT VIOLATIONS?

ROUTE CHARACTERISTICS

FACILITY LOCATION: NA

24-HOUR RAINFALL: NA

DISTANCE TO SURFACE WATER (MILES): NA

PHYSICAL STATE: NA

CONTAINMENT: NA

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTANCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0

DRUMS

: 2163

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.4

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 3.0

EPA ID NO. : MID 058723867 HENKEL CORP. PARKER AND AMCHEN

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Y

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTANCE VALUE: 3

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0
DRUMS: 2163

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 3.0

EPA ID NO. : MID 058723867 HENKEL CORP. PARKER AND AMCHEN

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: UNLIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? Y

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM, PCBS & HEAVY METALS

TOXICITY/PERSISTANCE VALUE:

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.20

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118

HST-005



RCRA TREATMENT, STORAGE, AND DISPOSAL FACILITIES CORRECTIVE ACTION PRIORITIZATION

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Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, D.C. 20460

R05001 Work Assignment No. 5

EPA Region Various Site No.

September 30, 1994 Date Prepared

68-W4-0007 Contract No. PRC No. 070-R0500101PR

PRC Environmental Prepared by Management, Inc.

Shin H. Ahn Contractor Project Manager 312/856-8700 Telephone No.

Kevin Pierard EPA Work Assignment Manager 312/886-4448

Telephone No.

PRC PA/VSI Report - Heilert - 1994. for CA Ronhers on Priority Ciob. HENKEL CORPORATION, PARKER AND AMCHEN (MID 058 723 867)

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EPA. 1990. RCRA Part A Permit and Compliance Files.

PRC. 1994. "NCAPS Information Request - Michigan." Received by Facsimile from MDNR on February 14.

| MDEQ/WHMD | Fax:517-373-4797 | Sep 18 | '03 14 | | . 02 | |
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| (3) One drum with an app | | | | Volume of the | | |
| liquid below the hol | | | 12 | | | |
| of drums, ocze and c | olored waste mater | ial had | 13 | | | |
| collected It looke stored and waste had | · · · · · · · · · · · · · · · · · · · | | 14 | | | SOF |
| period of time. | | | 16 | | | , 249.) |
| (5) Drums were collapsed the rive | · · | the fence on | | | | |
| (6) One partially burrie | d drum between the | | 19 01HE | R (explain) | | |
| the river at the nor | ' | - | | LIANCE STAT | 1 1 5 5 5 00 M cm 1 3 cd | Pinni. |
| erecy I observed a s | trong, irritating | edor. I | | MPLIANCE | NCE SEL | |
| asked Richard Fredri | | | c. out o | F COMPLIANÇ | 15 1. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | |
| received permission | to inspect the roo | f to determine | 4 10 10 10 No. | SCHEDULE S SCHEDULE ME | ETING 2 | |
| While on the roof, I | could not detect | the odor. I | INCF | EMENTS | | |
| where it was coming | · · · | | | SCHEDULE, NO TING INCREM | A STATE OF THE STA | |
| back to investigate | • | A FROME OC | F. ON A | SCHEDULE, NO | T STAN | |
| | | * | | WN IF MEETIN | | |

| AIR QUALITY DIVIL N | PEHMIT ACTION | | NSPS | اران عالم الماران المراجع الماران | |
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| ACTIVITY REPORT | ANNUAL COMPLINVESTIGATION COMPLETED | IANCE | HEVISED | | |
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| STABLISHMENT | NO. | 7 | QUANTER | | vo. |
| looker Chemicals and Plastics Corporation | B_2 | 422 | MAY | | 02 |
| IUMBER AND STREET | . 4117 | , ' | L. Koiyur | | |
| ONTACT | TITLE | | COUNTY | , in | vo. |
| RIMARY ACTIVITY | <u> </u> | 4 | DISTRICT | , ; <u>}</u> | 16. |
| Page 2 of 2 | | , | Ann Arb | or | 38 |
| EMARKS: | · | | PROJECT | | |
| 8) There was not enough aisle space to al unobstructed movement of personnel and | lov the | | R SOURCE | L | |
| equipment in violation of RCRA-265.35 | spiri control | 02 IMINO | | | F. 147 |
| | | 1 ' ' | ING CONFEREN | VGE | |
| his hazardous waste storage area had many under RCRA of which I will do more investig | | _ 05 TRAI | NING | i in General | s vend |
| there also appeared to be Act 245 or water | discharge viol | 1 | | | |
| herefore, I will contact Water Quality Division Of | | 10 | mineral establishment Specification of the state of the | | |
| rdous Waste Management to arrange further | | | R (explain) | | |
| ind documentation of this bazardous waste s | | | EY ACTION | | |
| acility's unacceptable storage area. | | | SION POINTS | Y TANKA | NO. |
| | | INVE | STIGATED LE EMISSION A LIATION | | |
| | | 03 SOUF | ICE TEST ISTAFF | | |
| | | • } | MPANY) | | |
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| | and the second section is a second se | 17 | The second secon | | |
| | \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\ | | R (explain) | | |
| | | | MPLIANCE STATUS | | |
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| | Total . | | HEMENTS SCHEDULE NOT | | |
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| | | KN | OWN IF MEETING | 1175 | |

P. 04 Sep 18 '03 14:15

> د حد نظ Hay 27 198. by Linda Kojo

Date:

May 14, 1982

From:

J. E. Hutchison

Dept/Loc: Manufacturing-Morenci

Subject: RCRA Inspection -

On May 14, 1982, Linda Koivuniemi, representative for the Michigan Department of Natural Resources, Air Quality Division, performed a RCRA inspection of the Morenci facility. Those asked to give their input were Richard Speed, Richard Fredrick, Leland Huffaker, and Joyce Hutchison.

Listed below are the items that were suggested by Ms. Koivuniemi to assist us in our RCRA compliance.

- o a Log dates of outgoing manifests and date of returned certificate of disposal and signed manifests.
- List of waste materials consisting of quality, quantity, and/or volume.
- Follow up RCRA training with employees, train Jose' Diccion.
- For our Waste Analysis Plan keep a record and copies of all tests run on wastes, including Panel Department sludge. The records are to be kept at Morenci. An operating log must be kept as per Section 265.73.
- Institute a log for inspection of our fence that perimeters our waste material. This inspection should be done once a week, along with inspection of storage area as per Section 265.15.
- Review RCRA Plan annually.
- Store waste two drums wide with a suitable aisle to walk thru for 0 inspections.
- All leaking containers must be transferred immediately to good containers, and all spills promptly and properly cleaned up.
- o Submit Emergency Contingency Plan to local authorities, police chief and fire chief. A letter should accompany plan requesting their signature to confirm that they received such information.

Copies:

SUBJECT: RCRA Inspection

DATE: May 14, 1982

PAGE 2

- o Closure Plan cost estimate must be updated once a year, by May 19. Be sure to date the cost estimate as per Section 265.75.
- o Training of employees should be updated at least once per year and recorded as per Section 265.16.
- o The RCRA Interim Status Manual prepared in 1981 by R. G. Speed and L. K. Huffaker, which addressed all of the above items as well as the complete Section 265, texts were most helpful to the inspector. This manual should be updated and reissued.



FAX TRANSMITTAL

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE AND HAZARDOUS MATERIALS DIVISION CONSTITUTION HALL, ATRIUM NORTH 525 WEST ALLEGAN STREET PO BOX 30241 LANSING MI 48909-7741

| Date/Time: 9-18 Has Pages: Fig. 19 | |
|---------------------------------------|-----|
| To: Prian Freewan | |
| Department: | _ |
| Company: | |
| Phone: Fax: 312-353-4342 | _ |
| From: Clay Spences | |
| Unit: | |
| Section: | |
| Phone: 577-373-7968 Fax: 517-373-4797 | |
| Note: Brian - Henhel files from AQD | |
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TO SECURITION OF THE PROPERTY OF THE PROPERTY

13:00 P. 09 Sep 18 '03

Fax:517-373-4797

MDEQ/WHMD

SPARTMENT OF NATURAL P. SOURCES MICHIGAN

INTEROFFICE COMMUNICATION

AQ.D.-Lausing Fle B2422 Lenause Os.

June 14. 1982

TO:

Al Howard, OHWM, MONR

U.S. EPA, Region V. Chicago

FROM:

Linda Kojvuniemi, A.Q.D.

SUBJECT:

Hooker Chemicals and Plastics, Morenci

RCRA AND ACT 64 VIOLATIONS

Attached are:

- (1) Three activity reports describing my recent RCRA investigations to Hooker Chemicals and Plastics, Morenci.
- (2) A letter from John D. Kashner of Hooker dated June 1, 1982.
- (3) RCRA inspection report.
- (4) Draft EPA Compliance Order.

Please note in my three attached activity reports that this company has changed its story on more than one occasion:

- (1) At the beginning the hezardous waste drums had been accumulating since April, 1981; then later the drums had been in storage prior to RCRA rules going into effect on November 19, 1980.
- (2) Also, at the beginning the company would not accept returned product/waste unless the company returning the unused material paid a fee of approximately \$120 per drum. Then, after I informed the company they were accepting unmanifested waste, they changed and said they accepted unused product back from the customer for credit

It is my understanding that the Federal Register/Vol. 45, No. 229/Tuesday, November 25, 1980/Rules and Regulations, does not apply to the Hooker returned material because the returned product/waste is not regulated under 261.33, but bazardous based on its characteristics under Sub part C of 40 CFR 261.

Due to the serious violations caused by leaking and open hazardous waste drums. It is my belief that this company should be fined and issued the attached Compliance Order without further delay.

Voe Boyle, U.S. EPA Region V (no attachments) sent directly to Chicago from the Ann Arbor Air Quality Office.

| MDEQ/WHMD F | Fax:517-373-4797 | | Sep 18 | '03 | 3 13: | 02 P.1 | LQ | | |
|--|--|------------------|-------------------|-------------|--|-----------------------------|---------------------------------------|--------------|----------|
| DEPARTMENT OF NATURAL R | URCES | RECEN | | | | NESHAP | | | |
| AIR QUALITY DIVISION | .,, | PERMI | | | | NSPS | | | |
| ACTIVITY REPOR | IT | INVES. | AL COMPLIA | NCE | | REVISED STATUS | | · . | |
| AQ-42 | to-m- | ™ COMPL | _ETED | | | | , | ţ, | <u>.</u> |
| 7.4 | | | | | ľ | DATE MM/ | | 1 | |
| ESTABLISHMENT | | | NO. | | | 05-18-8 QUARTER | 2 | NO. | |
| establishment or Chemicals and Plastics C Number and Street | ornoretian(Former | elv Par | B-242 ker Chem | 22 11 ca | 1) · | YAM | | 02 | |
| NUMBER AND STREET | Or har war | - | CITY | | | STAFF | , | NO. | 1 |
| 322 W Main Street | | | Morer | ıci_ | | L. Koiv | unien | 12 97 No. | |
| CONTACT Richard Fredrick | | ! [| Prd'n Su | m 14 | _ | Lenswee | · ′ | 46 | |
| PRIMARY ACTIVITY | A | | | 444 | | DISTRICT | | NO. | 1 |
| Chemical Production-Mixing. | RCRA Inspection. | #2: | | | - | Ann Arb | CT. | 80 | |
| REMARKS: | | | | | MAJOR S | PROJECT | | | |
| Conducted a joint investigation hazardous waste storage pro | | | | 01 | MINOR S | | | L | 1 |
| <u>District Engineer, Water Qu</u> | uslity District #1 | l. As | | | RESIDEN | | | ĺ | |
| in my previous activity rep | | | | 1 . | | G - CONFERE | NCE | | |
| appeared to be Act 245 (Wat company's hazardous waste | | | | 05 | TRAININ | iG | | } | |
| or leaking drims. Therefor | | | | 08 | | | | | |
| follow up inspection. | | | | 09 | | | | | |
| | | | | 10 | AT (150) | [ta]. | | | 1 |
| Roy and I informed the com | bluow T tet vee | he co | : llecting | 00 | OTHER | explain) | | | } |
| more information for my RCI | | | | | SURVEY | ACTION | TYPE | NO. | |
| representative of the U.S. | • | | | 01 | EMISSIO: | N POÍNTS GATED | - | | |
| inspecting the company for Since the MDNR's Office of | | | | 02 | | EMISSION | | | 1 |
| (OHWM) does not have field | | _ | | 02 | EVALUA | | | | |
| anyone at this inspection. | | | | | | | } | | |
| them of the huge number of that Roy and I would follow | | | | 04 | SOURCE (COMP. | | | <u> </u> | |
| sampling. OHWM was in agre | | | | , | GRAB SA | | | | |
| complete inspection to dete | | | | 06 | PICTURE | STAKEN | 1 ' | | |
| leaking drums located in the storage area. | ie company's nazar | rdous t | raste | 10 | | | | | |
| | • | | | l . | | | | | |
| When I checked the company the company generally had a | | | | I – | | | · · · · · · · · · · · · · · · · · · · | | |
| the company generally had the problems of leaking dru | | | | 1 | | | | | |
| aisle space. One problem v | was cited in April | 1 1982 | : a | 15 | | | | | |
| harrel of 70% ethylemine (1 | _ | | | 16 | ************************************** | | | | l |
| not a Hooker product) had investment of the second | | | arm | 17 | | | | | |
| "rupturing and venting" to | | | | 19 | | | | | |
| in the drum. This was the | -source of the ota | rong, | | 30 | OTHER (| | | | |
| irritating odor that I had | | | | А | IN COMP | ANCE STATUS | ٠. د | | |
| May 14, 1982 site investige storage drum was not in the | ::102: TALS WESTS e same storage er: | es A ti | at I hed | 1 | | | CE | | |
| -shows on my first inspection | on, but in storage | e aree | A | c. | QUT OF | COMPLIANCE | NOT . | 1 | |
| approximately 20 feet west | | | | _ | | CHEDULE | - | | |
| -attacked). | | | | U. | | HEDULE MEE' MENTS | ING | . | |
| The company informed Roy a | | | | E. | ON A SC | HEDULE, NOT | | ļ | , : |
| accumulating since April 1 | | | | _ | | ng incremed | | | |
| lation of Act 6b, P. A. 19 requires a permit | Marcell Store | a <u>re, v</u> i | <u> </u> | ۴ , | | HEDULE, NOT N IF MEETING | | Í | |
| PROPERTY OF THE PARTY OF THE PA | | | | | | | | | |

| MDEQ/WHMD | Fax: 517-373-479 | ? | Sep 18 | '0 | 3 <u>13</u> : | :02 P.1 | 1 | |
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| | URCES | COMP | LAINT | | | NESHAP | | |
| DEPARTMENT OF NATURAL R AIR QUALITY DIVISION | | | NSPS | | | | | |
| ACTIVITY REPO | DT | ANNL | JAL COMPLIA | NCE | | a Evicen | | |
| | E 16. 4 | I INVE | TIGATION | | | REVISED STATUS | | |
| AQ-42 | | 1 | | | | DATE MM/DI | 2/ YY | |
| | | | | | | 05-18-82 | | |
| ESTABLISHMENT - | ! | | NO. | | | QUARTER | | NO. |
| Hooker Chemicals and Pla | istics Corporati | on | B-2422 | | • | MAY | | 02 |
| NUMBER AND STREET | | | CITY | - | | STAFF | | NO. |
| | | | 1 | | | L. Koivun | iemi | 97 |
| CONTACT | | | TITLE | | | COUNTY | , | NO. |
| | | | | | | Lenawee | | 46 |
| PRIMARY ACTIVITY | | | | | | DISTRICT | | NO. |
| Page 2 | | | | | | Ann Arbor | | 08 |
| REMARKS: | | | | | F | ROJECT | | _ |
| <u>if storing longer than c</u> | ne year. | | | 01 | MAJOR S | SOURCE | | |
| | | | • | 02 | MINOR S | SOURCE | | |
| Mr. Fredrick informed us | | | | 03 | RESIDEN | - | | |
| were still on site was t | • | _ | | 04 | | G — CONFEREN | ÇE | |
| getting approval from Ce | | | | 05 | TRAININ | iG. | | |
| switched to Chemical Was | | | | 07 | | | | |
| vas working on a contrac | | | | 08 | | | | |
| ship the waste. The shi | ·bbrug dare uso i | not been | set yet. | 09 | | | | والمستني |
| | | | | 10 | | | | - ************************************ |
| Anamhina II | Tamana Alamana II. ada a | | | 00 | OTHER (| | | |
| Accepting Unmanifested E | lazardous waste: | | | | SURVEY | ACTION | TYPE | NO. |
| When select the the driver | יל אמנים תו באמני | eceds be | | <u></u> | | ~ | 1166 | 140. |
| When asked why the drums were in such bad shape, i.e. leaking and corroded, Mr. Fredrick said many of the drum | | | | 01 | INVEST | N POINTS GATED | | |
| had arrived that way as | | | | 1 | Meirie | EMISSION | <u> </u> | ├─- |
| material from companies | · - | | | 102 | EVALUA | | _ | |
| supplied as well as it | | | | 03 | SUTTECE | TEST (STAFF) | | |
| these companies returning | | | | 04 | SOURCE | | | |
| disposal cost of \$120 pe | | | | | (COMP | | | - |
| may get a credit toward | | | | 05 | GRAS SA | AMPLE | | |
| _ Hooker | | | | 06 | | STAKEN | | |
| | | | | 09 | | | | • |
| When I asked to see the | manifests for th | ese_off | .sdec | 10 | | | | |
| or returned products, th | | | | 11 | | | | |
| _ waste was not manifested | because Hooker | made the | <u> </u> | 12 | | | | |
| decision after the retur | ned drum content | ts vere i | .nspected | 13 | | <u> </u> | | |
| <u>by Hooker to determine in the little of the</u> | | | | 14 | <u> </u> | | | |
| the waste. I informed M | | | | 15 | | | | |
| - that the material "being | | | | 16 | | | | Ì |
| legitimately recycled or | | | | | <u> </u> | - Alasania tana | | |
| manifested. But at the | - | | | 1 | | <u></u> | |] |
| reclaim this material ar | | | | 19 | OTHER (| explain) | | |
| - be disposed of, it is a | | | | | | ANCE STATUS | | |
| accepted an unmaifested | | | | Α. | IN COMP | | | |
| | hazardous (40 CFR Part 261, Identification of Hazardous | | | | | VN COMPLIANC | ·c 1 | |
| Waste). | | | | B. C. | , - | COMPLIANCE N | | 1 |
| , and the same of | | | | - | | CHEDULE | | |
| Roy Schrameck informed Mr. Fredrick and Richard Speed | | | Ď. | | HEDULE MEET! | NG | 1 | |
| that it appeared Hooker may be required to conduct a | | | | | MENTS | | | |
| MDNR approved hydrogeological survey to determine if | | | €. | | HEDULE, NOT | | · } | |
| Hooker's practices of wa | | | GLOIDG | | | NG INCREMENT | rs | · · |
| water contamination. Th | | | - Annual Control of the Control of t | F. | ON A SCI | HEDULE, NOT | | . } |
| negatively to Roy's sugg | estion for a byd | iro-surve | y. | | KNOW | N IF MEETING | | |
| 1 | | | | | INCRE | MENTS | | |

| MDEQ/WHMD Fax:517-373-4797 | Sep 18 | ,0 | 3 <u>1</u> 3:03 | P. 13 | 2 | |
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| AIR QUALITY DIVISION PERMIT | | | NSPS | | | |
| ACTIVITY REPORT | L COMPLIA | NCE | I I DEAM | | | ; |
| COMPLE | TED | | L STAT | n2 | | |
| AQ-42 | | | DATE | MM/O | 5/YY | |
| | | | 05 | 1 <u>8</u> 82 | | ************************************* |
| STABLISHMENT | | | · | | | NO. |
| Hooker Chemicals and Plastics Corporation CI | 11 Syr55 | | STAF | F | | NO.2 |
| TOTAL AND THE T | • | | | : | المست الم | 07 |
| CONTACT | TLE | | ดับชีว | (A) vun | | NO. |
| PRIMARY ACTIVITY | | | Terr | 3 1.co - | | NO 6 |
| - Page 3 of 3 | | | | nata. | | |
| HEMARKS: | | | PROJEC | CT_ | | 68 |
| Request for Pictures and Samples: | | 01 | MAJOR SOURC | Ė | , | |
| | | [| | E | | ; |
| Roy and I asked the company officials if they had | | " | RESIDENCE | | سند | |
| Objections to our taking pictures and samples. Running Speed asked John D. Cashner, Plant Manager, for | ichard | 04 | MEETING - CO | NFEREN | CE | |
| permission. Mr. Cashner came in to Mr. Speed's or | ffice | 05 | INTINING | | - Company | |
| where we were waiting and said it was all right. | | 08 | | | | |
| | | 09 | = <u></u> | | - , - | · |
| I took twenty-two pictures and Roy took three same | | 10 | Office / | .) | | |
| from the ground, (description attached). We saw a different drum storage areas. Apparautly, net | | uu | OTHER (explain | d | | ļ |
| were lost in processing, since they were | rot | | SURVEY ACTIC | JN. | TYPE | NO. |
| were lost in place sping, since they were neturned to me them were kodes. Mr. Fredrick insisted that the company was got | | 01 | EMISSION POIN | | | |
| presently storing ignitible or reactive waste as re | ported | ĺ | INVESTIGATED | | | |
| in their Part A appliention to the U.S. WA. I | | 02 | VISIBLE EMISS EVALUATION | ION | | |
| observed in storage area at least one drum labels | | 02 | SOURCE TEST | (STAGE) | | ` |
| Industrial Solvents; therefore, I am not convinced Mr. Fredrick was accurate in this statement. There | that efore. | | SOURCE TEST | | | |
| since Roy and I did not have the proper equipment t | | | (COMPANY) | | | |
| sample drums, I will be returning to Hooker with th | ne | | GRAB SAMPLE | | | |
| proper sampling equipment to verify what is in some | | | PICTURES TAK | EN ; | · | ¦ · . |
| the drums, and compare these samples to what Hooker | | 10 | | | | |
| in their operating record (as required by 40 CFR 26 | ן דרבויה | 11 | | | | 38 |
| Boy and I also looked at an area of 1,000 gallon at | | 12 | , | | | |
| tanks in the basement of the west manufacturing but | | 13 | | | | |
| used to store corresive products going out (e.g. no nitrate). These tanks may be used to store hazardo | | 14 15 | · · · · · · · · · · · · · · · · · · · | | · | , , |
| waste if needed in the Auture | - us | 16 | | | | |
| | | 17 | | | - | |
| Hooker's Prdt labeling system: | | 18 | | | <u> </u> | |
| vr. area Batch # | 1 | 19 00 | OTHER (explain |) | | |
| a. Ma Ma | <u> </u> | - | COMPLIANCE | ···· | | |
| 7 1 /2373 The 9 refers to 1 | 979. | A. | | | | |
| | | | UNKNOWN CON | | | \neg |
| 91273-cold cleaner lying on its side next to fence | erea_ | C, | | | OT | Ì |
| 2 | Ì | D | ON A SCHEDUL | | NC · | |
| Size of storage area & (estimated): 29 drums X 3 | אַ פַּװנִרדַה | 7 - | INCREMENTS | | MG | : |
| drime equals annersimately 1,300 drims. | | | ON A SCHEDUL | | | } |
| Mr. Fredrick said he "had 935 drums stored in back | and | | MEETING INC | | 'S | 1 |
| | | ⊭. | ON A SCHEDUL | E, NOT | | 1 |
| 150 across the street". Also, in the futual the | | | I-48 1-48 | 7 m | | |
| 150 across the street". Also, in the futual the company hoped to have only 80 drums in storage at a | 44 | • | KNOWN IF ME | - | | •] |

Memo to File, W.Q.D., OHWM, U.S. EPA Region V From Linda Koivuniemi, A.Q.D. Ann Arbor July 7, 1982
Page 4

had an aerial photo taken showing wastes haphazardly lying around behind the wall of drums showing in this photo. Note pictures of this area 6 taken June 22, 1982, #23-38.

May 27, 1982

#22: 12:24 PM: Took with a flash, F 5.6, 125, the reason the flash was needed was because it had just gotten dark; it started to rain after this photo was taken.

A. Roy Schrameck collecting sample #4 from area 3. We did not get pictures of samples 1,2, or 3. All four samples were split with Hooker.

B. Company said this was likely oil and emulsifier. ESD lab tested and found pH 3, flash point approximately 190°F.

June 22, 1982: It had rained the night before these pictures were taken in area

#23: 12:12 PM : F 5.6, 125

A. Sample #1 collected by Roy Schrameck in area 6, next to the river.

B. Sample #1 collected from surface of ground next to fence. Note darkstained material forming a pathway to the river; also, hole in fence. Even though it had rained and the barrels and ground were still wet the storage pad and surface of ground were heavily stained with green-yellow, black liquid wastes.

#24: 12:16 PM : F 8, 125

A. Area 6 - west side, collection point for sample #1.

B. This is a wider angle of picture #23, supra. Please note the yellow-green, dark colored material leaching to river.

#25: 12:17 PM : F 8, 125

A. Sample #2-another surface ground sample collected a few feet south of sample #1 in area Calong river.

B. Note liquid storage drum in foreground; company could not identify the contents. We could not collect a sample of this waste because it would have to be placed in a recovery drum. The fiberpac barrel's outer shell had disintegrated. Company promised to immediately place in recovery drum and sample to determine proper disposal and share the sample with the DNR.

#26: 12:18 PM : F 8, 250

A. Same as #25, supra: Close-up of where Roy collected sample #2, sample #2-visible on sample bottle.

B. Note dark- stained soil.

#27: 12:19 PM : F 5.6, 125

A. Approximately 4 ft. to east of sample collection point #2. Sample #3.

B. Note green-yellow oil-like slick on ground in foreground.

| ACTIVITY REPORT | NVES | T N AL COMPLIZE TIGATION LETED | _ | -c+ | NESHAP NSPS REVISED STATUS DATE MM/D | | |
|--|---|----------------------------------|------------------------------|-------------------------------------|--|----------|-----------|
| LOS Sally Swarson USEP | | 40910 | <u>1 </u> | <u>/</u> | 06-22-82 | <u> </u> | NO. |
| | _] | | 3422 | • | | | İ |
| Hooker Chemicals and Plastics Corp. (Formerly NUMBER AND STREET | | <u>cer Unemi</u> CITY | _ca1 | J | JUNE STAFF | | 02 NO. |
| -322 W. Main Street | | Moreno | :i | | L Koivur | iemi | 97 No. |
| Richard Fredrick | | Prod. Si | w't | - B | LENAUTE DISTRICT | | 1.6. |
| Chemical Production-Mixing Pal of 5 | _ | | T | F. | ANN ARBOR | | 08 |
| Roy Schrameck, W.Q.D. #1, and I inspected stor 6 which is south of the storage building neriver. River | | | 1 | MAJOR S MINOR S RESIDEN | SOURCE OURCE ICE 3 – CONFEREN | CE | <u></u> |
| Storage bldg | À | <u>(5)</u> | 08 09 10 00 | OTHER (| exp(ain) | | |
| The state of the s | 77:74 | - | <u> </u> | SURVEY | ACTION | TYPE | NO. |
| There was no easy path to get back to the fence the river in storage area (a). First we tried and of storage area (b) but drums and lab. same phazardly strewn made it impossible to get to west side of this storage area via this path. We got through by going along the south side of building and pushing in the fence to get to the of storage area (b) which is on a concrete pade | d the ples the Final of the west | e south e e lly, e storag | 03 2 <mark>4</mark> 05 | VISIBLE EVALUA SOURCE SOURCE (COMPA | EMISSION TION TEST (STAFF) TEST ANY) | | |
| Mr. Fredricks and Lee Huffaker accompanied Roy we collected 4 samples from the ground-no drum sampled. The drums which we were most concern were two badly decomposed plastic lined fibpac laying on their sides. One of which was leaki ground and had eaten into the wood that the baplaced on. The liquid was possibly a chromic substance, since there was a greenish-yellow metal. | s we ed a bar ng c rrel acid | rels on to the was | 10 11 12 | | o raken | | |
| near these two barrels on the ground. Roy same before mentioned material; but, since it had a rained heavily the night before the sample was more diluted than it would have been if we had before the rain. There was evidence of rain be the area was still wet, as it had just rained. | pled ppar pro col ecau | this ently bably lected | 17 18 19 00 A. | IN COMP | ANCE STATUS | | |

When I had originally seen this contaminated part of area (b) on 6-15-82, there had been a lot more multiplored liquid on the ground. This likely had been asked away by the recent rain. There was evidence that water washed directly from this storage pad into the river, because there were obvious drainage areas. Some of which were stained dark-not unlike an oil slick.

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Staff Report

Occidental Chemical Corporation
Parker Surface Treatment Products Division
322 Main Street
Morenci, Michigan

Linda Koivuniemi, DNR Air Quality Division, conducted a RCRA inspection at Occidental Chemical in Morenci on May 14, 1982. There were numerous violations of the RCRA regulations surfaced as a result of that in inspection. Linda noted that the storage area was generally in poor condition with what appeared to be chemical residues on the ground surface, leaky drums and indications of overland runoff from the storage area to Bean Creek on the west property line of the company. As as result of these observations, Linda contacted the District I Water Quality Division office on May 17, 1982 and dicussed the potential groundwater and surface water problems associated with the site with the writer. We agreed to meet at Occidental Chemical on May 18, 1982 so that I could evaluate the situation with regard to potential groundwater and/or surface water contamination and possible violations of Act 245, P.A. 1929, as amended.

May 18, 1982

I met with Linda and she furnished me with a copy of the company's Part A RCRA application and reviewed her observations of May 14, 1982. Linda and I then went to Occidental Chemical and met with Mssrs. Richard Fredrick and Richard Speed and advised them that Linda was doing a follow-up/continuation regarding the RCRA inspection and that I would be inspecting the site relative to possible Act 245 violations. We requested, and received, permission to inspect the drum storage areas, take pictures and possibly collect some samples off the ground in the storage areas. Permission was granted verbally by Mr. John Kashner, Manager-Manufacturing, Occidental Chemical.

All the drum storage areas were undiked and four of the six areas were on stone or unprotected earth. With reference to the attached site drawing (attachment I), the storage areas are described below:

- 1 Located at the northwest corner of the manufacturing building on a crushed stone base. This area contained an estimated 200 drums + 5%. Approximately 10% of the drums were damaged but there were only minimal indications of any leakage onto the ground. At least one drum had the outer metal completely rusted out and the remaining "drum" was empty.
- 2 This area is located just north of the new drum storage building on a concrete pad. The pad was covered with "dirt" and leaves. There were approximately 1536 drums + 5%, of which about 25% appeared to be damaged and/or leaking. Several drums had chemicals on the outside indicating leaks from the drums. There was "oilly" residue soaked into the leaves and dirt on the pad

Arter we collected the drum samples we met with Mssrs. Kashner, Fredrick and Huffaker to discuss additional RCRA information that Linda needed. During our discussion, Lee Huffaker indicated that he felt some of the stored material would not have needed to be manifested under RCRA because it had been returned prior to November 19, 1980 when RCRA regulations took affect.

June 22, 1982

Linda and I met with Dick Fredrick, Lee Huffaker and John Kashner to discuss the PCB results obtained in our May 18, 1982 samples, collect additional RCRA information and inspect the storage area that Linda discovered during her June 15, 1982 inspection.

Linda once again requested a copy of Occidental's operating record under RCRA. The company indicated they were still working on putting the information together. The record would not be done until all materials were shipped out to Chemical Waste Management. Linda then requested copies of all the waste characterisation Reports being compiled for Chemical Waste Management. The company responded by stating that about 80 drums had not been characterised yet because they could not get any markings off the drums but that samples from these drums had been shipped to the company's lab for analysis the previous week.

The company stated that the new storage area Linda had discovered behind the empty stainless steel drums in area 6, contained sample bottles from lab samples that someone had deposited in the area contrary to established procedures and two drums of liquid that no one knew anything about. The remaining drums contained "bag house" dust from the air scrubbers at the plant.

Linda and I inspected the expanded number 6 storage area. Several attempts were made to penetrate through to the waste area in question without success. We finally gained access by going along the south side of the new storage building and pushing the west property line fence back and squeezing between the fence and the drums to gain access to the west portion of area 6.

The area was generally a mess with deteriorated fibre paks of "bag house" dust having lost their contents all over the concrete pad. There were several open top drums of plastic bottles that Mssrs. Fredrick and Huffaker said were discarded lab sample bottles. When we entered the area, I could hear a hissing sound from one of the barrels. Two fibre pak type barrels with plastic liners had fallen over and the outside shell was deteriorated. Leakage from one of the fibre pak barrels had eaten through the wooden pallet it was resting on and had partially dissolved the cement at the edge of the pallet. There were definite dark colored stains leading from the storage area, under the fence and toward Bean Creek. At least two open top barrels contained rusted, disintegrated aerosol cans once containing material similar to WD-40.

cussion, the company personnel reluctently agreed that someone could have returned a drum to them that contained other than their product and that in reality they had no way of knowing what was in all the drums in the storage area.

I told the company that we wanted them to do a study of the sediments and water in Bean Creek above and below their facility for organics, phosphates and metals and a hydrogeological study to determine groundwater quality and flow direction. The study plan was to be internally discussed with Occidental's corporate environmental personnel during a planned July 12-13, 1982 environmental audit with a letter being sent to us by July 23, 1982 committing to the study and giving us a date for a plan submittal. The south storage area (#6) that we had sampled was to be completely cleaned up by July 16, 1982.

Mr. Richard Speed from Occidental subsequently contacted the writer by telephone on June 24, 1982 and advised me that the environmental audit had been delayed until July 19-20, 1982. We agreed therefore, to meet with personnel from the Morenci facility and Occidental corporate staff on July,9, 1982 to discuss the requested studies. This agreement and our study requirements were confirmed by letter of June 29, 1982 from the District I office.

July 9, 1982

Linda Koivuniemi and I met with the following personnel from Occidental Chemical Corporation on this date:

John Kashner, Plant Manager, Morenci Richard Speed, Environmental Engineer, Morenci Mike McLain, Project Engineer, Morenci Robert Schuttler, Director, Environmental Health and Safety, Niagra Falls, N.Y.

Neither Lee Huffaker, Chemist, or Richard Fredrick, Production Superintendent, for Morenci were in attendance at this meeting.

Several items were discussed during our meeting. A summary of each major item follows:

PCB Sources - We verified with the company where we collected our May 18, 1982 samples.

The company is still unaware of any possible PCB sources on the site. Mr. Schuttler indicated that Occidental had collected a composite core of about the first six inches of soil depth in roughly the same area we collected our surface sample and found no detectable PCB. I stated that I did not see how this negated our data at all since their sample was from a different location and a vertical soil composite,

whereas our sample was scrappings of the organic layer on top of the concrete pad.

Site Clean up - The number six storage area clean up was completed by June 28, 1982. All on-site waste drums from all storage areas have now been either moved to inside storage or shipped off-site to Chemical Waste Management. The company has manifested 1300 drums for disposal. Of these, the company stated 400 to 500 drums were waste and the rest were bag house dust.

Company officials now indicate that the drum storage existed for about 18 months, placing the start of accumulation around January 1981. This is the third variation of an accumulation start date that the company has indicated.

The company agreed that a secure method of determining if a returned drum had been opened was necessary. They are working on devising a drum seal method for future shipments.

Bulk loading facility - The only materials that were bulk loaded into tank trucks were Bonderites. These materials would have contained metallic phosphate compounds. The hose drainage and wash out water from the bulk loading operation is the material discharged into the ground through the previously described stainless steel drum at the loading facility.

On-site organics would have been contained in various solvents and Bonderlub compoundings.

Hydrogeological and Bean Creek Studies - Although Mr. Kashner has implied all along that the Morenci plant supported our request for a groundwater study, Mr. Schuttler indicated that he did not feel that such a study was absolutely necessary. We showed him the pictures taken of the site and explained our concern relative to the leaky drums and the bulk loading facilities. Mr. Schuttler indicated he would reevaluate the need for a hydrogeological study and respond to us by August 4, 1982 as to the company position regarding this study.

Mr. Schuttler was concerned about the validity of sediment samples and interpretation of any resulting data from the requested Bean Creek study. He indicated that Occidental had been involved in similar requests at other facilities and the merit of the study was always questionable when it was completed. I volunteered that our Biology Section had been involved in numerous creek sediment studies and never seemed to have a problem collecting the samples or interpreting the resultant data. Finally, I volunteered that we would do the creek study and the company could do the groundwater study.

Copper (mg/kg) - 1,800 Nickel (mg/kg) - 1,600 Lead (mg/kg) - 23 Zinc (mg/kg) 36

Note: k means less than

NA means "analytical method has not yet been approved by laboratory"

July 27, 1982

Jack Wuycheck and Dennis Swanson from the Biology Section met the writer in Morenci to do a stream study in Bean Creek. Sediment and water samples were collected upstream and downstream of Occidental Chemical. A report pertaining to this study is being complied by Jack Wuycheck.

While we were doing the study we noted two discharges from Occidental to the river and two sewage discharges from the Morenci system were noted. The north (upstream) discharge from Occidental changed colors several times while we observed it and collected samples. Color variations were grey, white, brownish and purple at various times.

After we collected our stream samples, we proceeded to Occidental Chemical and contacted Mssrs. Kashner and Fredrick about the discharge. We described the location where the pipe was entering the river and neither Mr. Kashner or Mr. Fredrick had any idea what the source could be. They were invited to go out and look at the discharge and we left the office and proceeded toward the creek. On the way, Mr. Fredrick disappeared to get a key for the gate that they forgot had to be opened. He joined us shortly afterward with a maintenance man with a drawing of part of the sewer system serving Occidental (see attachmentII). Although the drawing is no longer accurate relative to buildings shown and it is not to scale, it did show that the sewer system could by-pass to the Creek. We located IMH #106, opened the cover and discovered that the system was overflowing. The company then contacted Morenci DPW to have someone come out and stop the by-pass.

While we were waiting we pulled the adjoining cover and found the "regulator" chamber. The sewer system serving Occidental is part of the Village system, which is a combined sewer system. This particular "regulator" consisted of a slide-gate at the outfall end of the chamber with a two section low head dam/backwater gate arrangement on the west side of the chamber. We found a long metal pipe on the company property and tried to push the backwater gates shut but they would not stay closed. I noted that water was flowing through the slide-gate opening along only about 25% of the base. I stuck the pipe down along the gate base to see if it was blocked and dislodged a considerable amount of greyish colored sludge from in front of the gate. The flow immediately filled the whole gate base and the by-pass to the Creek stopped. Sludge similar in physical characteristics to that found in the gate chamber had also been noted previously at the outfall to Bean Creek.

PRC Environmental Management, Inc 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118

HST-005



RCRA TREATMENT, STORAGE, AND DISPOSAL FACILITIES CORRECTIVE ACTION PRIORITIZATION

FINAL REPORT

ATTACHMENT 1

CUMULATIVE SCORING SUMMARY FOR 1,696 FACILITES

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No. : R05001

EPA Region : 5

Site No. : Various

Date Prepared : September 30, 1994

Contract No. : 68-W4-0007
PRC No. : 070-R0500101PR
Prepared by : PRC Environmental

Management, Inc.

ptractor Project Manager : Shin H. Ahn

Contractor Project Manager : Shin H. Ahn
Telephone No. : 312/856-8700
EPA Work Assignment Manager : Kevin Pierard

Telephone No. : 312/886-4448

| MUEU/WHMU Fax:517-373-4797 | OWINTVINI SEH TO | 1 1 | NESHAP | . 02 | 1. |
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| compliance of Subtitle C of the Resource Conser | rvation | Mar. 20 | IG - CONFE | RENCE | 4, |
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| (2) in the Part A application): | | 04 SOURC | E TEST STA | FF 1 | |
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| drums in storage). | | 05 GRAB | SAMPLE | | 17 |
| (2) Uncovered drums. (3) One drum with an apparent forklift hole no | | 06 PICTUI | ES TAKEN | | |
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| (5) Drums were collapsed and falling into the | ience on | | C 1 8 3 3 3 5 5 | | 4 8 |
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| the river at the north end of the storage | | | (explain) | A C. C. Contains | |
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| asked Richard Fredrick what the odor was; | | | OWN COMPLI | | She |
| he could not smell enything. I then asked | and the same of th | The same of the sa | COMPLIAN SCHEDULE | CE NOT. | |
| received permission to inspect the roof to | | | CHEDULE M | EETING | |
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| Therefore, I will contact Water Quality I | Division and Al | 09 | | Array of Legal 1 |
| Howard Environmental Services Division | Office of Hoz- | 10 | | Maria Cara Cara Cara Cara Cara Cara Cara |
| ardous Waste Management to arrange further and documentation of this hazardous waste | er investigations | 00 OTHE | R lexilain | |
| facility's unacceptable storage area. | | SURV | EY ACTION | TYPE NO |
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by Linda Koron

Date:

May 14, 1982

From:

J. E. Hutchison

Dept/Loc. Manufacturing-Morenci

Subject: RCRA Inspection -

On May 14, 1982, Linda Koivuniemi, representative for the Michigan Department of Natural Resources, Air Quality Division, performed a RCRA inspection of the Morenci facility. Those asked to give their input were Richard Speed, Richard Fredrick, Leland Huffaker, and Joyce Hutchison.

Listed below are the items that were suggested by Ms. Koivuniemi to assist us in our RCRA compliance.

- o | Log dates of outgoing manifests and date of returned certificate of disposal and signed manifests.
- List of waste materials consisting of quality, quantity, and/or volume.
- o Follow up RCRA training with employees, train Jose' Diccion.
- For our Waste Analysis Plan keep a record and copies of all tests run on wastes, including Panel Department sludge. The records are to be kept at Morenci. An operating log must be kept as per Section 265.73.
- o Institute a log for inspection of our fence that perimeters our waste material. This inspection should be done once a week, along with inspection of storage area as per Section 265.15.
- o Review RCRA Plan annually.
- o Store waste two drums wide with a suitable aisle to walk thru for inspections.
- All leaking containers must be transferred immediately to good containers, and all spills promptly and properly cleaned up.
- Submit Emergency Contingency Plan to local authorities, police chief and fire chief. A letter should accompany plan requesting their signature to confirm that they received such information.

Copies:

SUBJECT: RCRA Inspection

DATE: May 14, 1982

A THE RESIDENCE OF THE PROPERTY OF THE STATE
PAGE 2

- o Closure Plan cost estimate must be updated once a year. by May 19. Be sure to date the cost estimate as per Section 265.75.
- o Training of employees should be updated at least once per year and recorded as per Section 265.16.
- o The RCRA Interim Status Manual prepared in 1981 by R. G. Speed and L. K. Huffaker, which addressed all of the above items as well as the complete Section 265, texts were most helpful to the inspector. This manual should be updated and reissued.

14:13



FAX TRANSMITTAL

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE AND HAZARDOUS MATERIALS DIVISION CONSTITUTION HALL, ATRIUM NORTH 525 WEST ALLEGAN STREET PO BOX 30241 LANSING MI 48909-7741

PRC PA/VST Report - Heulel - 1994. In CA Rouhing on Priority Cists.

HENKEL CORPORATION, PARKER AND AMCHEN (MID 058 723 867)

Henkel/Corporation, Parker and Amchen, formerly Parker Surface Treatment Products, produces metal-treating chemicals. The facility is located in Morenci, Michigan, and has been in operation since 1928. Extensive site contamination has been documented, probably as the result of improperly stored drums. These drums were removed in 1982. The facility is presently permitted to store 15,000 gallons in containers (S01) of D001, D002, D003, and D007 listed wastes. Henkel has submitted a closure plan for their container storage area.

The groundwater route was scored based on limited data indicating the presence of heavy metals such as lead, zinc, and cyanide in the aquifer of concern. The metals were contained in improperly stored, leaking drums. The groundwater is the drinking water source and wells are located 50 yards from the site.

Henkel does not maintain an NPDES permit. Heavy metals and PCBs were detected in Bean Creek, which runs along the site boundary. The contamination detected in the creek was probably the result of reported leaking barrels. The use of Bean Creek for recreation is assumed. The distance to a sensitive environment is greater than 2 miles from the site.

No observed release was scored for the air route. The facility does have an air operating permit. However, no permit violations have been documented. Drums located outdoors did not have covers and because baghouse dust fiber packs were strewn across the property. Several organics are stored in these drums. Residences are located within 1/4 mile of the facility.

On-site contamination from PCB and heavy metals was observed. The access to this site is unrestricted.

References:

Parker Chemical Co. 1988. Revised Closure Plan. May 12.

MDNR. 1985. CERCLA PA of Parker Surface Treatment Products, Morenci, Michigan.

EPA. 1990. RCRA Part A Permit and Compliance Files.

PRC. 1994. "NCAPS Information Request - Michigan." Received by Facsimile from MDNR on February 14.

P. 01



FAX TRANSMITTAL

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE AND HAZARDOUS MATERIALS DIVISION
CONSTITUTION HALL, ATRIUM NORTH
525 WEST ALLEGAN STREET
PO BOX 30241
LANSING MI 48909-7741

| Date/Time: 9-18 100 Pages: 3 101 |
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| To: Brian Freewan |
| Department: |
| Company: |
| Phone: Fax: 3 12-353-4342 |
| From: Clay Spences |
| Unit: |
| Section: |
| Phone: 517-373-7968 Fax: 517-373-4797 |
| Note: Brian - Herhel files from AQD |
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| - br | dilding and pushing in | the fence to ge | t to the | rest side | | (00) | V 3/0 | | |
| 01 | storage area 6 which | h is on a concr | ete pad. | 6 1 | 05 | GRAS SA | AMPLE STAKEN. | | 17. 1 |
| Mz | . Fredricks and Lee Hu | ffaker accompan | ied Roy ar | nd me whi | <u>0</u> 9 | * ***** | | | |
| THE STATE OF | collected 4 samples f | rom the ground- | no drums v | vere | 10 | | 1 , 7 ; | | |
| 68 | ampled. The drums which ere two budly decompose | h we were most | concerned | about | 12 | | July Marker Th | W | |
| 18 | ying on their sides. | One of which wa | s leaking | on to the | 13 | | and the second of the second o | | The second second |
| B | round and had eaten int | o the wood that | the barre | EL WES | 14 | | of the second of the second | A | gi ji iya |
| | laced on. The liquid w lostance, since there w | | | | 16 | | 1 1/2 1/2 1/2 1 | g of "," have to print; | |
| ne | ear these two barrels o | n the ground. | Roy sample | ed this | 17 | | 33 % | | |
| | fore mentioned materia | | | | 19 | OTHER | | | |
| | ore diluted than it wou | | | | UU | - | ANCE STATUS | | |
| 11 1 10 1 10 10 10 10 10 10 10 10 10 10 | fore the rain. There | 트립어설링 사용되는 | | ause | A. | | LIANCE | | |
| 2 | le area was still wet, | es it hed just | rained. | | В. | | NN COMPLIANC | 7 | |
| TWE | en I had originally se | | | | C. | | COMPLIANCE N | 101 | |
| | rea 6 on 6-15-82, the | | | | D. | ON A SC | HEDULE MEET | ING | |
| | ished ever by the recen | | | | e | | MENTS HEDULE, NOT | a de la composición dela composición de la composición de la composición dela composición dela composición dela composición de la composición de la composición de la composición dela composición de la composición dela c | |
| TEI | nat water washed direct | ly from this st | orage pad | into the | | MEET | NG INCREMEN | TS - | |
| | ver, because there wer tich were stained dark- | | | | F. | 10 May 10 | HEDULE NOT | | |
| | | | | | | 71 E. S. SALVERS | MENTS | | |
| Williams | | | | EMBOLA DE LA LACIO | The same | Paragraph | Charles and the second | ER 554 | 24/1/07 |

| MDEQ/WHMD | Fax:517-373-4797 | Sep 18 | '03 12:5 | 55 P.03 | | , |
|--|--|--|--|-------------------------------|---------------------------------------|---|
| DEPARTMENT OF NATU | | COMPLAINT RECEIVED , | | NESHAP | 8 | 5364 (8 |
| AIR QUALITY | | PERMIT ACTION | | NSPS | | |
| ACTIVITY F | REPORT | ANNUAL COMPLIA INVESTIGATION COMPLETED | NCE | REVISED STATUS | | . Ar |
| AO-42 | | | | DATE MM/DD | IVY P | all |
| ESTABLISHMENT | | NO 7 010 | | 06-22-82 | | vo. |
| Hooker Chemicals and | Plastics Corp. (Formerl | | | JUNE | | 02 |
| NUMBER AND STREET 322 W. Main Street | 48 | Moren | ci | STAFF L. Koivunî | 20 27 70 | 97 |
| CONTACT Richard Fredrick | | Prod. S | | COUNTY | | 46 |
| PHIMARY ACTIVITY | <i>V</i> | , Frod. 5 | <u>up 6. , </u> | DISTRICT | · P | VO. |
| Chemical Production- REMARKS: | Wixing | | - F | ANN ARBO | OR I | 08 |
| Roy Schrameck, W.Q.D | . #1, and I inspected at | orage area | 01 MAJOR S | | | |
| - Vontingston | 146-51 | 2 | 02 MINORS | | | |
| These areas of dark | colored grass and soil m | ay have been | 04 MEETING | 3 – CONFERENC IG | CE · | |
| | ny's Parco T-8 which had erosol cans (approximate | | 07 | | | |
| sîze). Several pile | s of these serosol cans | vere strevn | 08 | | , , , , , , , , , , , , , , , , , , , | |
| | st vere corroded and emp ubricant similar to WD40 | | 10 | explain) | 0 | - |
| Many miles of the he | ghouse dust were exposed | ta tho | SURVEY | ACTION | TYPE | NO. |
| | g washed away each time | | 01 EMISSIO | N POINTS | • | |
| The 70% ethylemine d | rim which was incorrect! | y stored open, | 02 VISIBLE | EMISSION | - | \dashv |
| | er inspections had been a but was still stored or | | EVALUA 03 SOURCE | TION TEST (STAFF) | | |
| almost empty. Dispo | sal had been illegally a | ccomplished | 04 SOURCE | TEST | | |
| -by sllowing this mat atmosphere. | erial to evaporate direc | tly to the | 05 GRABSA | | <u>.</u> | |
| I took pictures of R | oy sampling and of the s | torere pres | 06 PICTURE | STAKEN | n | |
| A : | of pumpitals and or one s | 00,486 200 | 10 | | | 77. |
| PCB's: | | | 12 | | | |
| The semiles of surfa | Secondary rout collected | 5-78-82 tn | 13 | | ing see the | |
| | high levels of PCB's an | d chromium, | 15 | 70 80 0 | E 2 ³ | \equiv $ $ |
| | A was not as high: | | 17 | | i 4. 14 | |
| PCB n | 1242 CR-Total g/kg (ppb) mg/kg (ppm |) | 18 | | er er er General | |
| The state of the s | 9,000 4,700 | | OO .OTHER (| explain) ANCE STATUS | | |
| | | | A. IN COMP | LIANCE | | |
| Sample #2area 2 2 | ,500,000 2,500 | | | VN COMPLIANCE COMPLIANCE N | | |
| Sample #3area 3 | 6,500 37 | | 20 M W W W 1 | CHEDULE HEDULE MEETII | NG | |
| Clean-up and Company | Sampling: | | INCRE | MENTS | | |
| After we collected o | ur 4 samples and took pi | ctures of | ent to the transfer of the second | HEDULE, NOT NG INCREMENT | s , | |
| Storege area 6 | | Geabnes Plant | 12.01.17 | HEDULE NOT | | |
| NY TRANSPORT | | | Water Street Comments of the C | VENTS | 1 | |

| MDEQ/WHMD Fax:517-373-4797 Sep 18 | | |
|--|--|---------------|
| DEPARTMENT OF NATURAL F DURCES COMPLAINT RECEIVED , | NESHAP | |
| AIR QUALITY DIVIS.ON PERMIT | NSPS | |
| ACTIVITY REPORT | ANCE REVISED | |
| INVESTIGATION COMPLETED | STATUS | |
| AQ-42 | DATE MMM/DD/YY | in the second |
| | 06-22-82 | 100 |
| | | N |
| Hooker Chemicals and Plastics Corp. (Formerly Parker Chem | | N |
| 322 W. Main Street More | The second secon | 200 |
| CONTACT | COUNTY | No |
| Richard Fredrick Prod. | Sup't. LENAWEE | N |
| Chemical Production-Mixing | ANN ARBOR | C |
| REMARKS | PROJECT | d, |
| Roy Schrameck, W.Q.D. #1. and I inspected storage area | 01 MAJOR SOURCE | |
| (Continuation Page 3) | 02 MINOR SOURCE 03 RESIDENCE | |
| Manager, Mr. Richard Fredricks; and Lee Huffaker, Chemist | | |
| We requested and obtained as much of their operating | 05 TRAINING | |
| record as was available, i.e.: | 07 | |
| (1) 24 Manifests of Waste shipped since May 1982 | 09 | c |
| (a) as a second of the second | 10 | _ |
| (2) 29 Generator's Waste Material Profile Sheets | 00 OTHER (explain) | × |
| (3) Logs of : Chemical waste to ship, transfer | SURVEY ACTION . TYPE | N |
| record, and chemical waste already | 01 EMISSION POINTS INVESTIGATED | |
| shipped. | 02 VISIBLE EMISSION | |
| Much of the waste stored on the west side of area | EVALUATION | |
| near the river was not labeled and the company could | 03 SOURCE TEST (STAFF) | 2 |
| not specifically identify it. The company promised to | 04 SOURCE TEST (COMPANY) | |
| and test it to determine proper handling and disposal. | 05 GRAB SAMPLE | |
| The company's operating record is much more deficient | 06 PICTURES TAKEN | |
| then I had originally determined. | 09 | |
| Slowly, more and more information is dragged out of the | 11- | 1 |
| company concerning quality, quantity and location of | 12 | - |
| hazardous waste stored. The company has been less than a | derate | |
| waste activity and practices. | 15 | 1,76 |
| (RCCA) | 16 | 10 m |
| After we had copies of their operating record (required by Appendix I), I asked the company if they had | 17 | . 77 |
| PCB's on the property either in use or storage. They | 19 | _ |
| said no-absolutely not-not even in any transformers becau | COMPLIANCE STATUS | • |
| transformers had been tested. | A. IN COMPLIANCE | A 23 |
| Then Roy S. gave them a copy of the testing results of the | B. UNKNOWN COMPLIANCE | |
| 3 samples we collected 5-18-82. The three officials coul | C. OUT OF COMPLIANCE NOT | |
| explain the chromium levels because the company used | ON A SCHEDULE D. ON A SCHEDULE MEETING | 0.1 |
| chromium; but the 2.5% PCB-A 1242 was not readily | INCREMENTS | 1 |
| explained. We informed the company that they had to determine the extent of the contamination and the source | E. ON A SCHEDULE, NOT | 100 |
| determine the extent of the contamination and the source of the PCB's, as well as clean up the contaminated | MEETING INCREMENTS F. ON A SCHEDULE, NOT | |
| The state of the s | AL DANIEDOFF HOTER | |
| environment, i.e. solls, river sediment and ground | KNOWN IF MEETING | 3 |

| MDEQ/WHMD | Fax:517-373-4797 | Sep 18 | '03 12 | :56 P.05 |) |
|--|--|--|----------------------------|--|---|
| DEPARTMENT OF NATURAL | F DURCES | COMPLAINT RECEIVED | | NESHAP | 3 |
| AIR QUALITY DIVI | S.JN . | PERMIT | | NSPS | |
| ACTIVITY REF | PORT | ANNUAL COMPLIA | ANCE | l REVISED | e factoria. State |
| | Land Control of the C | INVESTIGATION COMPLETED | | REVISED STATUS | 19.15 |
| /AQ-42 | | | | DATE MM/D | D/YY |
| | | | | -06-22-8 | 2 |
| ESTABLISHMENT | | NO. B- | 2422 | QUARTER | and the second |
| Hooker Chemicals and Pl NUMBER AND STREET | astics Corp. (Former | Ly Parker Chem | ical) | STAFF | 286 () 1 5 () |
| 322 W. Main Street | | Moren | ci | L Kol von | i emi |
| CONTACT | | TITLE | | | 20 |
| Richard Fredrick | 1.5 | Prod. | Sup't. | DISTRICT | - |
| Chemical Production-Mix | ing Page h | 2 | - | ANN ARRO | 90 |
| REMARKS: | | ************************************** | O1 MAJOR | PROJECT | 7. |
| water if necessary. | Α | | 02 MINOR | · | ļ |
| The company agreed to h leaking or leaching was | ave this area (0) cl | eaned up and | 03 RESID | | ~~ |
| 1982 and to have a stud | y plan by approximat | ely July | 05 779 446 | NG - CONFÉREN | ICE |
| 12 or 13 when the paren | t company's environm | ental audit i | 9 05 THAIN | IIIVQ | WW - 1000 |
| conducted at the Morence | 1 Tacility. | undi c | 08 | | |
| Source of PCB's ?: | | | 10 | | |
| | that them were and | 1=+===17= | DO OTHER | R (explain) | 68 |
| The company informed us generated waste oil for | dust control: there | fore, a | SUDVE | Y ACTION | TYPE |
| waste oil for dust cont | rol from an outside | source was not | | ION POINTS | 1.115 |
| responsible for this PO | B contamination. | · · | INVES | TIGATED | |
| The company had transfe | rred and stored Reso | to-bond (an | | E EMISSION . | |
| oily product) in area | 2 ; therefore, they | vill be | | E TEST (STAFF) | |
| checking to see if this PCB's through an inadve | product is contamin | ated with | 04 SOUR | CE TEST | |
| | | | 05 GRAB | EST | |
| I called Dave Long (6-2 | 24-82), ESD Lab; he | said that | 34 15 | RES TAKEN | |
| there was practically a | o chance there was a | Lab error, | 09 | * | |
| ppm or 5.4% that the of | ll in the sample #2 v | ras approximate | 10 | | |
| 46% PCB. | | | 12 | 7 PT 1/2 | Register |
| I also asked Dave to me | ke sure chain of cus | stody was | 13 | No. 1 Part 1 | |
| maintained and to save | these three samples | indefinitely | 15 | | n 17 12 |
| or until notice from I | Roy-since they were I | Roy's samples | 16 | | e in eliji Nation |
| and may be important to | o either a civil or (| er white | 17 | × 10.5 | ing and and The state of |
| | | | 19 | | 10 E 11 11 11 |
| Company promised to say badly decomposed plast | ve samples of liquid | in the two | | R (explain) | 1. 45.000 Ba |
| es their bachouse dust | for me to pick up. | The | A. IN COL | The state of the s | 1 15 |
| company thought the lie | quid in these two bar | rrels was | B. UNKN | OWN COMPLIANC | 100000000000000000000000000000000000000 |
| Code 66701 T tried to | | | | F COMPLIANCE | NOT |
| Profile Sheet, but the | company had not give | en me | O 01 94 100 | CHEDULE MEET | ING |
| this document. I have | 66700 and 66702. bu | t not 66701. | INCF | REMENTS | 2.18 |
| Township and the control of the cont | 1317117 34 3 37 15 7 7 38 17 11 | and the second of the second o | I of a collect of the | SCHEDULE, NOT TING INCREMEN | off all and the little part |
| U.S. EPA Phone call of | (2) 中心的人的现在分词的人的人的现在分词的 | | 10 11 11 11 11 11 11 11 11 | CHEDULE, NOT | 117. DOI. TOWN YOUR. |
| Received telephone cal | 1 From Ms. Sally Sva | nson of | ##€¢KNO | WN IF MEETING | |
| and the advanced of the same | en den eine er er en | The Chimerope mann of the fill | ALL'S INSTRUMENTAL STATES | REMENTS NO WAR | We erg |

| DEPARTMENT OF NATURAL F | | (*) | IVED | | | NESHAP | |
|---|--|---|--|--|--|--|--------------------------------------|
| AIR QUALITY DIVISION | | PERM | | | | NSPS | , |
| ACTIVITY REPOR | RT . | ANNU | JAL COMPLIA | NCE | | REVISED | 4.30 |
| AQ-42 | MERSEARY | СОМР | LETED | | | STATUS | |
| | | | | | | DATE MM | ALCOHOL MANAGEMENT |
| STABLISHMENT | | | NO. B. | 242 | 2 | 06-22 QUARTER | |
| Hooker Chemicals and Plasti | cs Corp (Fo | ormerly Par | And the second second second | Company of the same of | E 2000 000 | JUNE | in con |
| NUMBER AND STREET | 15 13 3 | si wa | Morenci | | 1.45 | STAFF L. Koiv | nana am |
| CONTACT | *** | 1 | TITLE | | DIRECT SEC | COUNTY | WITCH |
| History activity | * | 9 | Prod. 8 | <u>'qu'</u> | t | T.KNAW DISTRICT | IE/E |
| Chemical Production Mixing | Pa | 5 of 5 | , | | | ANN | RBOR |
| REMARKS: | | | | | | ROJECT | |
| Roy Schrameck, W.Q.D. #1, 1 6 . (Continuation Page | | ed storage | RLER | 1000 | MAJOR S | | 20 |
| | | 20 | 11 | 03 | RESIDEN | ICE | |
| U.S. EPA Region V. Chicago. | Telephone (| (312) 886-7 | 482 | | MEETING | 3 –, CONFER IG | ENCE |
| She is assigned to write an | nd coordinate | e the enfor | cement | 07 | | | |
| or compliance order with the information I obtained | | | | 08 | | | |
| within the next week | since June | 14, 1902 01 | T CO TEL | 10 | | | # 1357 |
| | | | | 00 | OTHER | explain) | e say |
| | ell of Knyrry | anment o | U* | | | | |
| Telephone Call to Tyle Row | | | | | SURVEY | ACTION | TYPE |
| Enforcement Division on Ju | ne 23, 1982: | | | 01 | EMISSIO | N POINTS | TYPE |
| Enforcement Division on Just I called Lyle to make sure | ne 23, 1982: he knew abov | ut: all of | | 01 | EMISSIO INVESTI | N POINTS GATED | ТҮРЕ |
| Enforcement Division on Justin I called Lyle to make sure inspections at Hooker and | he knew about he high level | ut: all of | s in the | 01 | EMISSIO INVESTI | N POINTS GATED EMISSION | ТҮРЕ |
| I called Lyle to make sure inspections at Hooker and samples collected in area | he knew about he high level A. Lyle | ut: all of els of PCB' | s in the | 01 | EMISSIO INVESTI VISIBLE EVALUA | N POINTS GATED EMISSION | |
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| I called Lyle to make sure inspections at Hooker and samples collected in area there was no need for him or meeting with Hooker on is cleaning up the barrels | he knew above the high level to be involved une 22, 1982 and agreeing | ut: all of els of PCB' confirmed t ad in the s 2. Since t g to do a l | s in the hat sampling he compary | 01 02 03 1984 | EMISSIO INVESTI VISIBLE EVALUA SOURCE SOURCE (COMP | N POINTS GATED EMISSION TION TEST (STAF TEST ANY) | |
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| I called Lyle to make sure inspections at Hooker and samples collected in area there was no need for him or meeting with Hooker on is cleaning up the barrels geological study and perfor clean-up as necessary, it not be pursued. I will continue to the collected of the collected | he knew about he high level high level he involved to be involved une 22, 1982 and agreeing the subsection the subsection to intinue | ut: all of els of PCB' confirmed t ad in the s 2. Since t g to do a l quent envir | s in the hat compared to compa | 01 02 03 04 05 09 10 11 12 13 14 15 16 17 18 19 00 A. B. C. | EMISSIO INVESTI VISIBLE EVALUA SOURCE (COMP GRAB SA PICTURE OTHER COMPLI IN COMP UNKNOW OUT OF ON A SE | N POINTS GATED EMISSION TION TEST (STAF TEST ANY) AMPLE ES TAKEN EXOISIN ANCE STAT UN COMPLIANCE COMPLIANCE CHEDULE | US NCE ENOT |
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| I called Lyle to make sure inspections at Hooker and samples collected in area there was no need for him or meeting with Hooker on is cleaning up the barrels geological study and perfor clean-up as necessary, it not be pursued. I will continue to the collected of the collected | he knew about he high level high level he involved to be involved une 22, 1982 and agreeing the subsection the subsection to intinue | ut: all of els of PCB' confirmed t ad in the s 2. Since t g to do a l quent envir | s in the hat compared to compa | 01 02 03 04 05 09 10 11 12 13 14 15 16 17 18 19 00 A. B. C. | OTHER UNKNOW OUT OF ON A SCON | EMISSION TEST (STAF TEST ANY) AMPLE STAKEN EXPLAIN EXPL | US NCE ENOT ETING |
| I called Lyle to make sure inspections at Hooker and samples collected in area there was no need for him or meeting with Hooker on is cleaning up the barrels geological study and perfor clean-up as necessary, it not be pursued. I will continue to the collected of the collected | he knew about he high level high level he involved to be involved une 22, 1982 and agreeing the subsection the subsection to intinue | ut: all of els of PCB' confirmed t ad in the s 2. Since t g to do a l quent envir | s in the hat compared to compa | 01 02 03 04 05 09 10 11 12 13 14 15 16 17 18 19 00 A. B. C. | OTHER COMPLINCON A SCON | N POINTS GATED EMISSION TION TEST (STAF TEST ANY) AMPLE IS TAKEN EXPLISION EXPLISION COMPLIANCE COMPLIANC CHEDULE HEDULE ME MENTS | US INCE E NOT ETING ENTS |

Sep 18 '03 P. 07 Fax:517-373-4797 12:58 MDEQ/WHMD COMPLAINT NESHAP DEPARTMENT OF NATURAL F' 'OURCES RECEIVED AIR QUALITY DIVIS.JN PERMIT NSPS ACTION ACTIVITY REPORT ANNUAL COMPLIANCE REVISED INVESTIGATION COMPLETED STATUS DATE MM/DO/ OK-15 NO. B-2422 Hooker Chemicals and Plastics Corcoration (formerly Parker Chemical) HINR NUMBER AND STREET 322 W. Main Street Morenci Kolwmieni TITLE CONTACT TENAWEE PRICHARD FROMFICE Prod Sun!t DISTRICT ANN ARBOR 08 Chemical Production Mixing REMARKS: PROJECT .54° 551 Dhruman Shah, Permit Engineer and I met with Richard MAJOR SOURCE Speed at the company to discuss the Permit to Install MINOR SOURCE applications numbered 243-82, 244-82, and 245-82, RESIDENCE Dhruman needed more process information and wanted to MEETING - CONFERENCE look at existing equipment. The company is sending TRAINING. Dhruman a letter with the additional requested informs-07 09 Could not conduct a scheduled investigation since the processes were not operating at the time of the meeting, 00 OTHER (explain) OFFERDOW OF 6-15-82 SURVEY ACTION TYPE NO. (Resource Conservation Recovery Act-Haz. Waste): EMISSION POINTS INVESTIGATED I had received a telephone call (06-08-82) and an aerial 02 VISIBLE EMISSION photo (June 9, 1982) from Lyle Rowell of Environmental EVALUATION . Enforcement Division (E.E.D.) informing me that there 03 SOURCE TEST (STAFF) were some more drums that neither Lyle nor I had pre-04. SOURCE TEST (COMPANY) Therefore I ssked Mr. Fredricks wlously known about. which is located on the river GRAB SAMPLE about storage area storage building PICTURES TAKEN on the south side 09 AL 64 11 3 R124 15 Predricks indicted that there was not any hazardous waste stored there-only nonhazardous baghouse dust 17 (phosphetes) and empty drums. OTHER (explain) I insisted that I needed to take a look. COMPLIANCE STATUS continued to want to know why I thought there was IN COMPLIANCE anything back there that may be a problem. Finally, UNKNOWN COMPLIANCE I told him that I had seen an aerial photo that had been OUT OF COMPLIANCE NOT taken recently and wanted to check out the area. Thon-ON A SCHEDULE Mr. Fredricks said it was all right and I climbed D. ON A SCHEDULE MEETING (squeezed) through several rows of drums to discover Q INCREMENTS mess. There were approximately 300 drums of -ON A SCHEDULE, NOT MEETING INCREMENTS drums were open and filled with laboratory bottles ON A SCHEDULE, NOT filled with samples. Two fiber pac barrels with a KNOWN IF MEETING INCREMENTS

| MDEQ/WHMD | Fax:517-373-4797 | | Sep 18 | '03 | 12:5 | 59 P.I | 08 |
|---------------------------------------|-----------------------------|--|--|--------|--------------------------|---|--|
| DEPARTMENT OF NATURAL | r DURCES | COMPL RECEIV | | | | NESHAP | |
| AIR QUALITY DIVI | | PERMI | | | | NSPS | 8 1 |
| ACTIVITY REF | OPT | ACTIO | N L COMPLIA | NCE | 닏. | | |
| | 'VRI | INVEST | IGATION . | INCE | | REVISED | |
| AC-42 | | COMPL | ETED | t. | | 计26% | 出色線 |
| | | | | | | DATE MM | DD/YY. |
| ESTABLISHMENT | | <u> </u> | 10 | | | 06-15-8 | 2 1 1 1 1 |
| | micals and Plastic | 13. 4 | \$25-20.00; | -5F55 | | TUNE | |
| NUMBER AND STREET | MICALS AND PLASTIC | a. Corp. | CITY | -7472 | • | STAFF | 10 m |
| | | e ! | | | | L Koiv | uniemi |
| CONTACT | | · · · · · · · · · · · · · · · · · · · | TITLE | | | COUNTY | |
| PRIMARY ACTIVITY | | | - | | | DISTRICT | |
| Page 2 | | | - Albania | | | ANN ARB | OR: |
| REMARKS: | | | | | value modern | PROJECT | |
| plastic internal line | | | | | 5 6 6 | SOURCE . | |
| leaking. The fiberpa | | | | 100000 | MINOR S RESIDEI | | 11 10 |
| liquid was corrosive; | | | | | | G - CONFER | ENCE |
| - through some wood und | | | | 13 | TRAININ | IG | |
| I informed Mr. Fredri | cks that this "mos | s" had to | be | 07 | | | |
| cleaned up right away | | | | 09 | | | |
| contaminants washed d | irectly into the r | | | 10 | | | |
| adjacent to these lead | king drums. | | | 00 | OTHER | explain) | |
| Mr. Fredricks did not | know what was in | these two | | | SURVEY | ACTION | TYPE |
| fiberpac barrels cont | aining liquid. He | said the | | | | N POINTS | |
| company would analyze | | proper | | 1.0 | INVEST | | |
| disposal and clear up | the area. | *_ | | | VISIBLE EVALUA | EMISSION TION | |
| When I got back to the | e office I called | Roy Schr | ameck | 03 | SOURCE | TEST (STAF | F) |
| of W.Q.D. #1 to infor | m him of this newl | y discove | red 📗 | | SOURCE | | 8 22 |
| _ improper storage ores | | | The state of the s | 1 | COMP | . P | 4 3 |
| I left him a message | to call me Anen ne | returned | • | 1 | GRABS/ PICTURI | S TAKEN | |
| 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | e a | | | 09 | | nes des aconsessos | |
| Monday June 21, 1982 | • | | | 10 | | | |
| Roy called me back on | Monday 06-21-82 | Roy had | | 11 | | <u>t ta d.</u> Tertamajah | |
| received the results | | | | 13 | | | , , july 1 |
| showing extremely hig | h levels of PCB's | on the gr | ound nes | 100 | | , | - |
| the river. | | | ** *** * * * * * | 15 | • | | Maria de la compansión de La compansión de la compa |
| Therefore, Roy and I | | essary to | | 17 | | | |
| document what was in | this newly discove | ered unacc | eptable | 18 | | | |
| △storage area A Roy ca | | | | 19 | | awaloia) | |
| told Roy to follow up | | | | 00 | | explain) ANCE STATI | The state of the s |
| therefore, Roy Schram | | | | Ά | | LIANCE | |
| E.E.D. who informed R | oy that Lyle did n | not need t | o be | В. | UNKNO | WN COMPLIA | NCE |
| involved in our inves | tigation or meetir | g with Ho | oker, | C | | COMPLIANC | A 18711 114 |
| Roy and I arranged to | on to Hoober the | follows. | dev | D | A | HEDULE ME | an interest of the same of the same |
| THE REPORT TO | Appropriate the second | THE THE | The second second | | TOTAL STREET, SECTION OF | MENTS | |
| June 22. 1982. | | | $\Delta \mu u \partial_t U = 0$ | # 27 X | | HEDULE, NO | TAR |
| June 22, 1982. | MARIAMENTAL TO A CONTROL OF | 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7, 7 | A. 17.1 | | | | ALTERNATION OF THE PARTY OF THE |
| June 22, 1982. | | | | | | NG INCREM | |
| June 22, 1982. | | | | F. | ON A SC | NG INCREMI HEDULE, NC N IF MEETIN | |

MICHIGAN TPARTMENT OF NATURAL R TOURCES

INTEROFFICE COMMUNICATION

AQ.D.-hausing file
B2422
Lenauee Co.

June 14. 1982

Sep 18 '03

TO:

Al Howard, OHWM, MDNR

U.S. EPA. Region V. Chicago

FROM:

Linda Koivuniemi, A.Q.D.

SUBJECT:

Hooker Chemicals and Plastics, Morenci

RCRA AND ACT 64 VIOLATIONS

Attached are:

- Three activity reports describing my recent RCRA investigations to Hooker Chemicals and Plastics. Morenci.
- A letter from John D. Kashner of Hooker dated June 1, 1982.
- (3) RCRA inspection report.
- (4) Draft EPA Compliance Order.

Please note in my three attached activity reports that this company has changed its story on more than one occasion:

- (1) At the beginning the hazardous waste drums had been accumulating since April, 1981; then later the drums had been in storage prior to RCRA rules going into effect on November 19, 1980.
- (2) Also, at the beginning the company would not accept returned product/waste unless the company returning the unused material paid a fee of approximately \$120 per drum. Then, after I informed the company they were accepting unmanifested waste, they changed and said they accepted unused product back from the customer for credit

It is my understanding that the Federal Register/Vol. 45, No. 229/Tuesday. November 25, 1980/Rules and Regulations, does not apply to the Hooker returned material because the returned product/waste is not regulated under 261:33, but bezardous based on its characteristics under Sub part C of 40 CFR 261.

Due to the serious violations caused by leaking and open hazardous waste drums. It is my belief that this company should be fined and issued the attached Compliance Order without further delay.

Joe Boyle, U.S. EPA Region V (no attachments) sent directly to Chicago from the Ann Arbor Air Quality Office.

| MDEQ/WHMD Fax:517-373-4797 | Sep 18 '03 13:02 P.10 |
|---|--|
| DEPARTMENT OF NATURAL R URCES | RECEIVED |
| AIR QUALITY DIVISION | PERMIT NSPS |
| ACTIVITY REPORT | ANNUAL COMPLIANCE REVISED STATUS |
| AQ-42 | DATE MM/OD/YY |
| • | 05-18-82 |
| TABLISHMENT | INO. QUARTER |
| er Chemicals and Plastics Corporation (Form | B-2422 erly Parker Chemical) MAY |
| UMBER AND STREET | erry erry |
| 322 W Main Street | Morenci L. Koîvunîem |
| ONTACT | |
| Richard Fredrick | Prd'n Sup't. Lenavee |
| Chemical Production-Mixing RCRA Inspection | n #2. Ann Arbor |
| EMARKS: | PROJECT |
| Conducted a joint investigation of this co | mpany's 01 MAJOR SOURCE |
| hezardous waste storage practices with Roy | Schrameck, 02 MINOR SOURCE #1 As stated 03 RESIDENCE |
| District Engineer, Water Quality District in my previous activity report of 05-14-82 | |
| appeared to be Act 245 (Water Law) violati | ons due to this 05 TRAINING |
| company's hazardous waste drum storage are | ea, i.e. open 07 |
| or leaking drums. Therefore, Roy and I co | |
| follow up inspection. | 09 |
| | 00 OTHER (explain) |
| Roy and T informed the company that I wou | ld be collecting |
| more information for my RCRA report (as as | a suthorized SURVEY ACTION TYPE |
| representative of the U.S. EPA) and Roy w | ould be 01 EMISSION POINTS INVESTIGATED |
| inspecting the company for possible Act 2 Since the MDNR's Office of Hazardous Wast | Menagement 02 VISIBLE EMISSION |
| (OHWM) does not have field staff: they did | i not have |
| anyone at this inspection. I had contact | ad OHIM and infomed source Test (STAFF) |
| them of the huge number of leaking drums : | and, also O4 SOURCE TEST |
| that Roy and I would follow up with an in sampling. OHWM was in agreement with the | peed for a more 05 GRAB SAMPLE |
| sampling. Ohwa was in agreement with the control to determine the control | Heed for a more |
| leaking drums located in the company's ha | zardous waste 09 ——————————————————————————————————— |
| -storage area. | 10 |
| When I checked the company's inspection ? | |
| the company generally had not been noting | and correcting 13 |
| the problems of leaking drums, open drums | and inadequate 14 |
| aisle space. One problem was cited in Ap | ril 1982: a 15 |
| harrel of 70% ethylamine (no longer used not a Hooker product) had been expanding | due to warm |
| not a nooker product) had been expanding weather. Mr. Fredrick corrected this pro | blem by 18 |
| "rupturing and venting" to release the pr | 9681179 |
| in the drum. This was the source of the | strong, |
| irritating odor that I had detected durin | g my lirst or |
| May 14, 1982 site investigation. This was storage drum was not in the same storage | A CONTRACTOR OF THE PROPERTY O |
| storage drum was not in the same storage shown on my first inspection, but in stor | C. OUT OF COMPLIANCE NOT . |
| approximately 20 feet west of storage are | a A (disgram ON A SCHEDULE |
| attached). | D. ON A SCHEDULE MEETING INCREMENTS |
| The company informed Roy and I that the | rums had been E. ON A SCHEDULE, NOT |
| accumulating since April 1981. This is a | pparently a vio- MEETING INCREMENTS |
| lation of Act 64. P. A. 1979-long term st | orage, which F. ON A SCHEDULE, NOT |
| requires a permit | KNOWN IF MEETING INCREMENTS |
| | H564 |

| MUEU/WHMU Fax:517-373-4797 | | Sep 18 | . 03 | , | 02 P.1 | L | |
|---|--|---|--|--|---|--------|-----------|
| DEPARTMENT OF NATURAL R URGES | RECE | LAINT VED | | | NESHAP | | |
| AIR QUALITY DIVISION | PERM | N | • | | NSPS | | |
| ACTIVITY REPORT | INVES | AL COMPLIA TIGATION LETED | NCE | | REVISED STATUS | | |
| AQ-42 | O IVII | Lettes | | | | | |
| | | | | | DATE MM/DE | 3/YY | 1 |
| | | | | | 05-18-82 | | 12.2 |
| ESTABLISHMENT Hooker Chemicals and Plastics Corporation | | no. В - 2422 | | • | QUARTER MAY | | NO. |
| NUMBER AND STREET | | CITY | | , | STAFF L. Kolvun | iemi | NO. 97 |
| CONTACT | | TITLE | | * | COUNTY | | NO. |
| PRIMARY ACTIVITY | | | | | Lenswee | | 46 No. |
| Page 2 | | | | | Ann Arbor | | 08 |
| REMARKS: | | | T | | PROJECT | | 100 |
| if storing longer than one year. | | | | | | | 1 |
| LI SCOTTING TORREST GREAT ONE YEAR. | | | 1 - | MAJOR S | | • | <u> </u> |
| Mr. Fredrick informed us that the only reas | on th | le drums | 1 | RESIDE | | | - 1 |
| were still on site was because they had pro | | | 04 | | G – CONFEREN | CE | [|
| getting approval from Cecos; therefore, the | | | 1 | TRAININ | | | |
| switched to Chemical Waste Management in Al | abame | and | 07 | | | · | |
| was working on a contract and getting a tru | | | 80 | | | | |
| ship the waste. The shipping date had not | been | set yet. | 09 | | | | |
| | | | 10 | | | | · |
| Accepting Unmanifested Hazardous Waste: | | | 00 | OTHER | (explain) | | |
| | | | | SURVEY | ACTION | TYPE | NO. |
| When asked why the drums were in such bad s | hape | <u>i.e.</u> | 01 | | N POINTS | | |
| leaking and corroded, Mr. Fredrick said man | To V | the drum | 5 | INVEST | IGATED | ļ | l 1 |
| · | ~ ~~ | | T | | | L | |
| had arrived that way as returned product or | off | spec | 1 | | EMISSION | | |
| had arrived that way as returned product or material from companies which Hooker had or | off igin | spec lly | 1 | EVALUA | ATION | | |
| had arrived that way as returned product or material from companies which Hooker had or supplied, as well as, it was a bad winter. | off igina Mos | spec lly of | 02 03 | SOURCE | ATION TEST (STAFF) | | |
| had arrived that way as returned product or material from companies which Hooker had or supplied, as well as, it was a bad winter these companies returning this waste pay Ho | off igina Mos oker | spec lly of a | 02 03 | SOURCE SOURCE | ation : Test (Staff) : Test | | |
| had arrived that way as returned product or material from companies which Hooker had or supplied, as well as, it was a had winter these companies returning this waste pay Ho disposal cost of \$120 per drum, occasional? | off igina Most oker | spec lly of a company | 02 03 04 | SOURCE SOURCE (COMP | ATION : Test (Staff) : Test Any) | | |
| had arrived that way as returned product or material from companies which Hooker had or supplied, as well as, it was a bad winter these companies returning this waste pay Ho disposal cost of \$120 per drum, occasionall may get a credit toward their next purchase | off igina Most oker | spec lly of a company | 02 03 04 05 | SOURCE SOURCE (COMP GRAB SA | ATION : TEST (STAFF) : TEST ANY) AMPLE | | |
| had arrived that way as returned product or material from companies which Hooker had or supplied, as well as, it was a had winter these companies returning this waste pay Ho disposal cost of \$120 per drum, occasional? | off igina Most oker | spec lly of a company | 02 03 04 05 06 | SOURCE SOURCE (COMP GRAB SA | ATION : Test (Staff) : Test Any) | | |
| had arrived that way as returned product or material from companies which Hooker had or supplied, as well as, it was a had winter these companies returning this waste pay Ho disposal cost of \$120 per drum, occasionall may get a credit toward their next purchase Hooker | off igina Mos oker y a c | spec lly of a company | 02 03 04 05 | SOURCE SOURCE (COMP GRAB SA | ATION : TEST (STAFF) : TEST ANY) AMPLE | | |
| had arrived that way as returned product or material from companies which Hooker had or supplied, as well as, it was a had winter these companies returning this waste pay Ho disposal cost of \$120 per drum, occasionall may get a credit toward their next purchase Hooker. When I asked to see the manifests for these | off igina Mos oker va from | spec illy of a company | 02 03 04 05 06 09 | SOURCE SOURCE (COMP GRAB SA | ATION : TEST (STAFF) : TEST ANY) AMPLE | | |
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| DEPARTMENT OF NATURAL F VURCES COMPLAINT RECEIVED | 18 '0: | | 5 P.1 ESHAP | 2 | | |
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| - AIR QUALITY DIVISION PERMIT | | N | SPS | | | |
| ACTIVITY REPORT | | | EVISED | | | |
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| | | | ATE MM/D | D/YY | | .:: |
| TABLISHMENT NO. | | - 8 | 5.11 82 | | NO. | |
| Hooker Chemicals and Plastics Corporation B-Ok | 22 | | MAY | | 02 NO. | |
| MBER AND STREET | | 5 | TAFF | * '. : | NO. | .: |
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| IMARY ACTIVITY | | | STRICT | 4 | NO. | |
| Page 3 4 3 MARKS: | | | DJECT | | -08 | |
| Request for Pictures and Samples: | 01 | MAJOR SC | URCE | | 10 | 200 |
| | 02 | 6 //5 | | | - : | |
| Roy and I asked the company officials if they had any objections to our taking pictures and samples. Richar | 03 | | E (— CONFEREN | NCE | | |
| Speed asked John D. Cashner, Plant Manager, for | 05 | | | | | |
| permission. Mr. Cashner came in to Mr. Speed's office | Constant | | 3 | - | | |
| where we were waiting and said it was all right. | - 08 | | | | | |
| I took twenty-two pictures and Roy took three samples | _ 10 | | | () | | |
| from the ground, (description attached). We saw six different drum storage areas. Apparautly, produces | | OTHER (e) | kplaiņ) | 140 | | |
| were lost in processing since they were not network to me from Kodas. | | SURVEY A | January Indiana Salarah | TYPE | NO. | .: |
| | - 01 | EMISSION INVESTIG | | | | |
| resently storing ignitible or reactive waste as report n their Part A application to the U.S. EPA. I | | VISIBLE E | | | | 7 |
| observed in storage area at least one drum labeled industrial Selvents; therefore, I am not convinced that | 03 | SOURCE T | EST (STAFF) | | | į. |
| fr. Fredrick was accurate in this statement. Therefore | | SOURCE T | | - | - | 74 |
| sample drums, I will be returning to Hooker with the | 05 | GRAB SAN | MPLE | | | 4 |
| proper sampling equipment to verify what is in some of | | PICTURES | TAKEN | | | : . |
| the drums, and compare these samples to what Hooker has | | | | - | | ٠ |
| in their operating record (as required by 40 CFR 265.73 | 7. 11 | | | | <u>.</u> . | |
| Roy and I also looked at an area of 4,000 gallon storage | | | - E | | 11 | 6 |
| tanks in the basement of the west manufacturing building | | | | | × , | |
| nitrate). These tanks may be used to store hazardous | 15 | | | | | |
| waste if needed in the future | _ 16 | | | | | |
| Hooker's Prot labeling system: | _ 17 | | | , | | , , |
| | 19 | | | | | 3 |
| yr. area Batch # | 00 | OTHER (e: | xplain) NCE STATUS | | | |
| 7 / 2373 The 9 refers to 1979. | Α. | IN COMPL | | | | |
| | 8. | UNKNOW | N.COMPLIAN | | , | |
| 91273-cold cleaner lying on its side next to fence area | _ C. | | OMPLIANCE | NOT | 100 | ÷. |
| 21 | D | | HEDULE EDULE MEET | ING . | | |
| Size of storage area & (estimated): 29 drums X 3 drums | X 15 | INCREM | | | | |
| Mr. Fredrick said he "had 935 drums stored in back and | | MEETIN | G INCREMEN | ITS | | i |
| 150 across the street". Also, in the future the | | KNOWN | IF MEETING | | | 6 |
| company hoped to have only 80 drums in storage at a time | 0 | INCREM | ENTS | | L | |

INTEROFFICE COMMUNICATION

July 7, 1982

TO:

File, W.Q.D., OHWM, U.S. EPA Region V

FROM:

Linda Koivuniemi, A.Q.D. Ann Arbor.

SUBJECT:

Log of Pictures taken during three RCRA Investigations at Hooker Chemicals and Plastics Corporation, Morenci, MI

Date pictures (Standard 50 mm lens) were taken by L. Koivuniemi:

(1) May 18, 1982: Took 22 pictures, but two were essentially the same-just different exposure, therefore, only 21 different pictures: #1 thru #21. Roy and I collected 3 surface samples, but I wanted to sample drums because, for example, the company insisted there were no solvents stored in area 2; I noted a green drum near the center labelled industrial solvents. Since, we did not have equipment to sample drums, I planned to make arrangements in Lansing the next day 05-19-82 to get help and/or equipment to sample these drums by 05-20-82 or 05-21-82.

When I checked in Lansing to find out how to get the drums sampled before the end of the week, I was informed by Lyle Rowell that he would make the necessary arrangements because he may be needed for a criminal investigation. I agreed with Lyle that a joint investigation would be fine, but I wanted to sample drums before the weekend.

Without informing me, Lyle decided to go to Hooker and take samples alone on 05-20-82, and called me on Friday, 05-21-82. I had to start all over trying to get sampling equipment and arrange drum sampling because Lyle did not sample drums which I felt to be important. Hooker complained to Lyle about the number of sampling investigations. Lyle informed the company I was likely coming again, but that I would call before, if I wanted any drums moved which required a forklift. I did not call before my investigation on 05-27-82; therefore, I could not request the company to move barrels and sample the green drum labelled industrial solvents in storage area 2, see picture #16, which would have documented solvents, likely ignitable, within 50 feet of property line.

- (2) May 27, 1982: Only one picture taken on this date: #22.
- (3) June 22, 1982: Took 16 pictures in area (3): #23-38: Four samples: results not back as of 07-07-82; Roy delivered samples to ESD lab on 06-23-82.

Key: Picture # : time : camera setting

A. location

B. comments

May 18, 1982

#1: 3:15 PM : F 5.6, 60

A. Westside of storage area 2 -next to fence between river and storage pad.

B. Roy Schramack, W.Q.D. #1, collecting sample #1, greenish-dark; 19,000mg/kg (ppb) or 19 ppm PCB-A1242 and 47,000 mg/kg (ppm) CR-TOT.

Memo to File, W.Q.D. AHWM, U.S. EPA Region V From Linda Koivuniemi A.Q.D. Ann Arbor July 7, 1982
Page 2

#2: 3:16 PM : F 1.7, 60

A. West side of storage area 2 - Picture taken while standing next to fence and looking east toward manufacturing building.

B. Green/black waste on storage pad.

#3: 3:20 PM : F 4, 60

A. West side of storage area A next to fence, barrels lying down in background are near the storage building.

B. Sample #2, collected by Roy Schrameck. High levels of PCB's: 2,500,000 kg (ppb) or,2,5% A1242; and 2,500mg/kg (ppm) CR-TOT.

#4: 3:24 PM : F 8, 60

A. S.W. side of storage area 2, note storage building in background, adjacent to river.

B. Picture #5 (below) is a close-up of the corroded drum in this picture.

#5: 3:25 PM : F 2.8, 60

A. S.W. side of storage area A, on N. side of storage building next to river, storage building in background.

B. Note corroded condition of drum.

#6: 3:28 PM : F 5.6, 60

A. North side of storage building; south side of storage area 2 - approximately 20 ft. from the river.

B. Note hole in drum-contents were apparently allowed to leak out.

#7: 3:30 PM : F 8.0, 60

A. Again, north side of storage building, in area 2, wide angle of picture #6.

B. Note drum with hole near bottom (center bottom of this picture)-same drum as picture #6.

#8: 3:34 PM: F 11, 60

A. East side of storage area 🛕

B. Note black boards under storage drums in S.E. side of storage area

#9: 3:35 PM: F 11, 60

A. East side of storage area East edge of stored drums is approximately 50 ft. from the river.

B. If the green barrel in the center held industrial solvents, as it was labeled, it would have been less than 50 ft. to the property line. But we could not get to it to sample and company insisted there were no ignitable liquids (<140°F) in this storage area Later, May 27, we sampled and found ignitable liquids on the eastern edge, but this edge was about 50 ft. from property line (I paced it off). Note leaker in left bottom of photo.

#10: 3:40 PM: F 8, 125

A. New Area: storage area A note Mfg. building in background.

B. Note poor condition of drums.

Memo to File, W.Q.D., OHWM, U.S. EPA Region V From Linda Koivuniemi Q.Q.D. Ann Arbor July 7, 1982 Page 3

#11: 3:42 PM : F 8, 125

A. Center of storage area 3.

B. Roy Schrameck collecting sample #3 from ground-no concrete pad.

GW 749 Lot 689-old raw material, dye-greenish blue.

#12: 3:45 PM : F 8, 125

A. Single drum with dark colored, oily ooze on outside in area [3].

Roy Schrameck later sampled this (picture #22 taken 05-27-82)drum.

#13: 3:50 PM : F 8, 125

A. Storage area 3 - note mfg. building in background.

B. Richard Fredricks on north side of storage area 3. Storage area /3\is where 70% ethylamine was stored open and evaporating.

#14: 3:53 PM : F 4, 60

A. N.W. Corner of property, next to river, note fence in background. Storage area/5).

This drum was an example of open drums in storage with various types and amounts of waste/junk.

#15: 3:55 PM: ?-did not document camera setting.

A. Storage area 🐧 -near river.

B. Note stained material on ground-no storage pad.

#16: 3:56 PM: F 8, 125

A. Back to original or main storage area /2 (Eastside), trees on river bank in background.

Note green barrel-was labeled industrial solvent. (refer to picture #9).

#17: 3:57 PM : F 8, 125

A. Small storage area 🔼 .

Note Mfg. building in background.

#18: 3:58 PM: F 5.6, 60

A. Storage area 🛆 - near center.

B. Single corroded drum: company thought it could be X185 Bonderite make-up.

#19: 3:59 PM : F 16, 125

A. Tanks, loading rack on south side of Mfg. building.

B. Note barrel at base of loading rack which is used to allow waste acid to drain through to ground (therefore ground water).

#20: 4 PM: F 5.6, 125

A. N.E. side of storage area 6.

This drum labeled Leaker Bottom was empty, my field note book is in center-bottom of picture.

#21: 4:03 PM : F,5.6, 125

Storage area 6 -south side of storage building.

The company insisted there was absolutely no reason for me to be inspecting this area because only empty drums and nonhazardous baghouse dust was stored here. As one is able to observe, there was no easy route through these drums, since there was no aisle space for movement to the back, i.e. west side of this storage area. Later, Lyle Rowell of Environmental Enforcement Division

Memo to File, W.Q.D., OHWM, U.S. EPA Region V From Linda Koivuniemi, A.Q.D. Ann Arbor July 7, 1982 Page 4

had an aerial photo taken showing wastes haphazardly lying around behind the wall of drums showing in this photo. Note pictures of this area 6 taken June 22, 1982, #23-38.

May 27, 1982

#22: 12:24 PM: Took with a flash, F 5.6, 125, the reason the flash was needed was because it had just gotten dark; it started to rain after this photo was taken.

A. Roy Schrameck collecting sample #4 from area 3. We did not get pictures of samples 1,2, or 3. All four samples were split with Hooker.

B. Company said this was likely oil and emulsifier. ESD lab tested and found pH 3, flash point approximately 190°F.

June 22, 1982: It had rained the night before these pictures were taken in area

#23: 12:12 PM : F 5.6, 125

A. Sample #1 collected by Roy Schrameck in area 6, next to the river.

B. Sample #1 collected from surface of ground next to fence. Note darkstained material forming a pathway to the river; also, hole in fence. Even though it had rained and the barrels and ground were still wet the storage pad and surface of ground were heavily stained with green-yellow, black liquid wastes.

#24: 12:16 PM : F 8, 125

A. Area 6 - west side, collection point for sample #1.

B. This is a wider angle of picture #23, supra. Please note the yellow-green, dark colored material leaching to river.

#25: 12:17 PM : F 8, 125

A. Sample #2-another surface ground sample collected a few feet south of sample #1 in area along river.

B. Note liquid storage drum in foreground; company could not identify the contents. We could not collect a sample of this waste because it would have to be placed in a recovery drum. The fiberpac barrel's outer shell had disintegrated. Company promised to immediately place in recovery drum and sample to determine proper disposal and share the sample with the DNR.

#26: 12:18 PM : F 8, 250

- A. Same as #25, supra: Close-up of where Roy collected sample #2, sample #2-visible on sample bottle.
- B. Note dark- stained soil.

#27: 12:19 PM : F 5.6, 125

- A. Approximately 4 ft. to east of sample collection point #2. Sample #3.
- B. Note green-yellow oil-like slick on ground ir foreground.

Memo to File, W.Q.D., NWM, U.S. EPA Region V From Linda Koivuniemi, A.Q.D., Ann Arbor July 7, 1982 Page 5

#28: 12:20 PM : F 5.6, 60

A. Sample #4 collected by Roy Schrameck in area 6.

B. Note Roy collecting sample #4, the concrete appeared to have been broken down by the multicolored ooze on the pad surface.

#29: 12:21 PM: F 5.6, 60

A. Same as #28 above-after Roy finished collecting sample #4.

B. Note stained material on surface of pad in background. Also, the fiberpac barrel in this picture was leaking onto surface of concrete pad.

#30: 12:23 PM : F 11, 250
All four samples collected from surface of pad, or ground next to the fence are shown.

#31: 12:25 PM: F 11, 250

A. General area where samples were collected in area 6.

B. Note Richard Fredricks and Roy Schrameck. As noted before, company promised to save samples of these two fiberpac drums for me.

#32: 12:27 PM: F 8, 125

A. General condition of storage area 6 behind wall of empty or stainless steel drums, see Picture #21. The wall of drums are on left side of this picture.

B. Aerosol cans and drums have apparently leaked all or most of their contents. Company reported to me that they did not have records documenting the quantity or quality of waste in this storage area. They did not report this area to either the U.S. EPA or MDNR (Roy or myself). Vegetation in background is southern property boundary.

#33: 12:28 PM : F 5.6, 125

A. S.W. corner of Hooker property. Note where fence comes together in upper right of picture.

B. Picture #37 is a close up of material spilling from drums shown here falling against fence, right side of picture.

#34: 12:30 PM: F 8, 125

A. Barrel of lab samples-many open-in center of area .

B. Fredricks still insists these barrels and bottles became corroded over the winter; yet, he says this white powdered material is nonhazardous baghouse dust.

#35: 12:31 PM : F 11, 125

A. Area 6 - note southern property line fence in background.

B. Baghouse dust piles and yellow green-ooze on concrete pad surface. This was as bad in person as this picture shows.

#36: 12:33 PM: F 11, 125

A. Stainless steel drums in N.W. section of area 6.

B. Drum labeled "nitric acid" was hissing and bubbling (rain water on top of drum). R. Fredricks removed bung to allow pressure to be relieved.

Memo to File, W.Q., OHWM, U.S. EPA Region V From Linda Koivun i, A.Q.D. Ann Arbor July 7, 1982 Page 6

#37: 12:34 PM: 1.7 1/2, 60

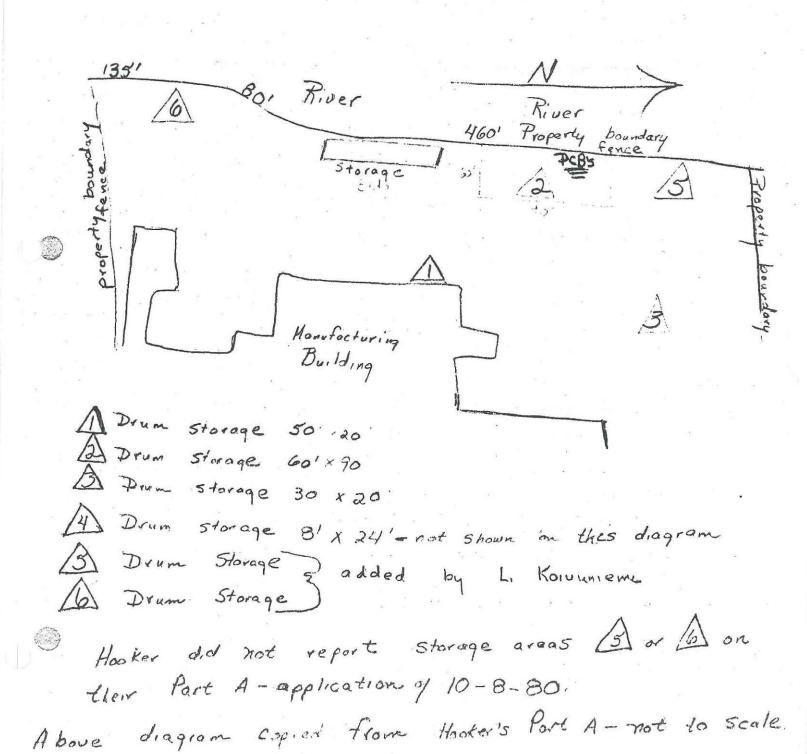
A. Next to river, west side of area 6.

B. This is a close up of drums on and near fence-leaning against wood pallet (see picture #33 for wider angle).

#38: 12:36 PM : F 4, 250

A. S.W. section of area 6.

B. Looks like lab chemicals-obviously not carefully controlled-not part of RCRA required operating record.



| RECORD OF COMMUNICATION | PHONE CALL DISCUSSI FIE | |
|--|-------------------------|---|
| то: | (Record of item checked | |
| Linda Kolvuniemi, MONR | SKSwanson | DATE 6-23-82 |
| SUBJECT | | TIME 3:30 p.m. |
| Hooker Chemical AKA PARKER | AKA OXY METALS - MI | D058723867 |
| I told Linda I will be the order. | tuch. person working on | . this |
| She said she has addi | honal info: | |
| 1. RCB sampling found | d extremely high levels | A. Garage Constitution |
| 그를 가는 하는 가게 하는 사람이 되었다. 그는 사람들은 사람들은 사람들은 사람들이 되었다. 그는 사람들은 그는 사람들은 그들이 가득하는 것 같아. 그들은 그들은 그를 다 그를 다 하는 것 같아. | ronal drum storage are | 4.6. Carried a 1966 (18) 19 11 11 11 11 11 11 11 11 11 11 11 11 |
| MONR aur photo, an | d subsequently went + | o inspect it. |
| | is, believed lost, turn | |
| | | |
| 墨마다한 아니다 나는 이 선생님이 되었는데 그 사람이 있었다면 했다면 한 사용 전하다 되었다면 하지만 하는 한 어떻게 한다고 하는데 이 그리고 되었다. 그 사람이 나를 모르는데 하는데 하는데 하는데 하는데 하는데 하는데 하는데 하는데 하는데 하 | hotos. She will send | ▲ ** - ** ** ** ** ** ** ** ** ** ** ** * |
| | its name again, no s | |
| 70. Occulental Ch | enrial Corp. Parker ? | unface |
| Treatment Produ | <u>cts division</u> . | |
| 5. She will send ad | ditional info (Sample | results |
| photos, activity, | eports etc) to me by | next week. |
| | | |
| | | |
| | | |
| | | |
| CONCLUSIONS, ACTION TAKEN OR REQUIRED | LANDOUL LANDON | |
| ready to add her | nevel her order a | na be |
| | | |
| | | |
| | | gradi dan san S |
| | | |
| | · | |
| FORMATION COPIES | | |
| ro:File. | | • |

REPLACES EPA HO FORM 8300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

EPA Form 1300-6 (7-72)

DEPARTMENT OF NATURAL RESOURCES AIR QUALITY SISION

| RECEIVED | NESHAP |
|---|-------------------|
| PERMIT ACTION | NSPS |
| ANNUAL COMPLIANCE INVESTIGATION COMPLETED | REVISED STATUS |

| | INVEST | L COMPLIA IGATION | NCE | | REVISED STATUS | | |
|---|--|---------------------------------------|-------------|---|---------------------------|----------|--------------|
| | AQ-42 | ETEU | | | DATE MM/DD | (VV | |
| | Tal Soll Sagres 110 TOA Par | 75 1: | CP (1 | +- | | | |
| | TO: Sally Swanson - USEPA Reg | O. B | 2/12 | <u>ー</u> 1 | 06-15-82 QUARTER | | NO. |
| j | Hooker Chemicals and Plastics Corporation (former | _ | | | }\JUNE STAFF | | NO. |
| | 322 W. Main Street | Managana | . | |] | ł | ļ. |
| | | Morenc | -k | | COUNTY VURI | eni- | 07 NO. |
| į | Richard Fredrick PRIMARY ACTIVITY | Prod. Su | p't | | LENAWEE DISTRICT | | 16 NO. |
| | Chemical Production-Mixing | | | | ANN ARBOR | - | Los |
| | REMARKS: | _ | | F | PROJECT | | |
| İ | Dhruman Shah, Permit Engineer and I met with Rich | ard | 01 | MAJOR | | ĺ | Ĺ |
| | Speed at the company to discuss the Permit to Ins | tall | 02 | MINOR S | | | |
| | applications numbered 243-82, 244-82, and 245-82. Dhruman needed more process information and wante | d to | 03 04 | RESIDE | VCE G — CONFEREN | CF | |
| | look at existing equipment. The company is sendi | ng | 7 - 1 - 2 | TRAININ | | CE | |
| | Dhruman a letter with the additional requested in | forma- | 07 | | | | |
| | tion. | | 08 | | | | |
| | | | 09 | | | · | |
| | Could not conduct a scheduled investigation since | cne | 10 | OTU55 | | | |
| | processes were not operating at the time of the m | recorne) | 00 | OTHER | lexp'ain <i>i</i> | | |
| | / * | | | SURVEY | ACTION . | TYPE | ivo. |
| | - RCRA (Resource Conservation Recovery Act-Haz, Was | te): | 01 | EMISSIO INVESTI | N POINTS IGATED | | <u> </u> |
| | I had received a telephone call (06-08-62) and a | <u>aeriel</u> | 02 | VISIBLE EVALUA | EMISSION ATION | | |
| į | photo (June 9, 1982) from Lyle Rovell of Environm Enforcement Division (E.E.D.) informing me that t | THOUSE There | U.S | | TEST (STAFF) | | |
| | were some more drums that neither Lyle nor I had | pre- | ļ | SOURCE | | | ĺ |
| ļ | - viously known about. Therefore, I asked Mr. Fred | lricks | | | ANY) | | |
| | about storage area 10 which is located on the | e river | 05 | GRAB S | AMPLE | | |
| į | -on the south side of the storage building. | · · · · · · · · · · · · · · · · · · · | 06 | PICTUR | ES TAKEN | | į . |
| ; | fromy boundry River N | | 10 | | | | |
| i | D. A. | | 11 | | | | 1 |
| ĺ | 200 | <u> </u> | 12 | | | | |
| į | 3-8134 | 3 | 13 | <u> </u> | | | |
| | Mary Pld (1) | | 14 | | | | |
| i | Mr. Fredricks insisted that there was not any ha | zerdons : | 16 | | | ~ | |
| į | waste stored there-only nonhazardous baghouse du | | 17 | o. 14, 100 100 100 100 100 100 100 100 100 10 | | | |
| | (phosphetes) and empty drums. | | 18 | | | <u>-</u> | |
| | | | 19 | OTHER | (explain) | | |
| | - I insisted that I needed to take a look. Mr. Pr | 1 | | | IANCE STATUS |] | |
| | continued to went to know why I thought there was | | Α. | | PLIANCE | | |
| İ | I told him that I had seen an aerial photo that | | e. | UNKNO | WN COMPLIANC | E | |
| | - taken recently and wanted to check out the area. | | Ċ. | | COMPLIANCE | TO | |
| | Mr. Fredricks said it was all right and I climbe | a l | 5.7 | | SCHEDULE | . NICE | |
| į | - (squeezed) through several rows of drams to disc | | Ð | | CHEDULE MEET EMENTS | LINE | |
| - | wasting mess. There were approximately 100 draw | | F. | | CHEDULE, NOT | | |
| _ | whiteh many were corroded, techning or opin - Bave drums were open and filled with laboratory bottl | | | MEET | ING INCREMEN | rs | |
| | Tiffed with samples. Two fiberpas barrels with | | \bar{U} . | | CHEDUNE, NOT | | |
| | | | | | IN IF MEETING . IMENTS | | |
| | | , | | mrs 1.4 | | | |

DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION

ACTIVITY REPORT

PERMIT ACTION ANNUAL COMPLIANCE INVESTIGATION COMPLETED

BPCLIVED



NSPS

REVISED STATUS

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| AQ-42 | | | | , | | |
|--|----------|-----------------------|-------------|---------------------------------------|------------------|-----|
| | | | | DATE MM D | DYY | |
| | | | | 06-15-82 | | |
| ESTABLISHMENT | o. | | | QUARTER | | NO. |
| Hooker Chemicals and Plastics. Corp. | B- | 242 | 5 | TUNE | | 02 |
| NUMBER AND STREET C | (TY | | | STAFF | | NO. |
| | | | | L. Koivur | niemi | 97 |
| CONTACT | ITLE | | | COUNTY | A - L 3-7-218.1- | ΝO. |
| | | | | LENAVER | | հե |
| PRIMARY ACTIVITY | | | | DISTRICT | | NO. |
| Page 2 | | | | AUN ADDOR | , | 0.0 |
| REMARKS: | | | | LANN ARBOE PROJECT | <u> </u> | 08_ |
| plastic internal liner were laying on their side, | | 0.1 | | | | |
| leaking. The fiberpac outer shell had broken dow | , one wa | | MAJOR S | | i | |
| | m and | 02 | MINORS | | | |
| only the plastic liner was holding the liquid. T | he | 03 | RESIDEN | | | |
| liquid was corrosive; it had dripped on & eaten | | 04 | | G – CONFEREN | 1CE | |
| through some wood under it. | | 05 | TRAININ | 1G | | |
| T information The area is at a contract the state of | _ | 07 | | ····· | | |
| I informed Mr. Fredricks that this "mess" had to | | 80 | | | | |
| cleaned up right away, since everytime it rained | the | 09 | | | | |
| contaminants washed directly into the river immed | liately | 10 | | | | |
| adjacent to these leaking drums. | | 00 | OTHER (| (explain) | | |
| | | | | | | |
| Mr. Fredricks did not know what was in these two | | | SURVEY | ACTION | TYPE | NO. |
| fiberpac barrels containing liquid. He said the | | 01 | EMISS10 | N POINTS | | |
| company would analyze them to determine proper | | | INVESTI | GATED | | |
| disposal and clean up the area. | | 02 | VISIBLE | EMISSION | | |
| | | | EVALUA | | | i |
| When I got back to the office, I called Roy Schra | meck | 03 | SOURCE | TEST (STAFF) | | |
| of W.Q.D. #1 to inform him of this newly discover | ed. | 04 | SOURCE | - | | |
| improper storage area. Roy was in Chicago; there | fore | 04 | COMP | | | |
| I left him a message to call me when he returned. | TUCE, | OΕ | GRAB SA | 5 MO) E | | |
| 1 rely firm a message to carr me when he returned. | | | | | | |
| | | 06 | PICTORE | STAKEN | 1 1 | i |
| Monday June 21, 1982 : | | 09 | | · | | |
| The state of the s | | .10 | | | | |
| Roy called me back on Monday 06-21-82. Roy had | 1 | 11 | | · · · · · · · · · · · · · · · · · · · | | |
| received the results from our 05-18-82 sampling | | 12 | | | | |
| | | 13 | | <u> </u> | | |
| showing extremely high levels of PCB's on the grothe river. | und near | 14 | | | | |
| one river. | | 15 | | | | |
| Whome form Day and T. A. 1.3. A. 1. | | 16 | | | | |
| Therefore, Roy and I decided it was necessary to | | 17 | | · | | |
| document what was in this newly discovered unacce | ptable | 18 | | | | |
| 💪 storage area 🖪 Roy called Ron Waybrandt, PCB Coor | ·di- | 19 | | | | |
| nator in Lensing and Lyle Rovell of E.E.D. Ron W | | 00 | 018684 | expland | | |
| told Roy to follow up as planned. Lyle was not i | n; | | COMPLI | ANCE STATUS | J | 1 |
| therefore, Roy Schrameck talked to Warren Hutchin | son of | \mathbf{A}_{*}^{-1} | ∃N COMP | LIANCE | _ [| |
| E.E.D. who informed Roy that Lyle did not need to | be | 8. | UNKNOV | VN COMPLIANC | E | } |
| _ involved in our investigation or meeting with Hoo | ker. | C. | OUT OF | COMPLIANCE | 10 L | |
| on Tues. 6-22-82. | 7 | | | CHEDULE | | |
| Roy and I arranged to go to Hooker the following | day | Đ. | | HEDULE MEET | ING | |
| June 22, 1982. | | | INCRE | | - | |
| | } | £. | | HEDULE, NOT | | |
| | | | | NG INCREMENT | τ'ς | |
| | | £ | | HEDULF, NO! | . ~ | 1 |
| The second section of the section of the | | | | REBUCE, NO: | | - |
| | | | INGRE | | |] |

. DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISIO

| RECEIVED | NESHAP |
|---------------------------------|---------|
| PERMIT | NSPS |
| ANNUAL COMPLIANCE INVESTIGATION | REVISED |

| ACTIVITY REPORT | ANNUAL COMPLIA | NCE | | REVISED | | |
|---|------------------|------------------|---|-----------------------------|-------------|-------------|
| L | COMPLETED | | لــا | STATUS | | |
| AQ-42 | 1 |),(∈ | = c7 1 | DATE MM/DE | 3/YY | |
| To: Sally Swarson USE | PA Rogia | ,) |) | 06-22-82 | | |
| ESTABLISHMENT | 120 | 422 | | QUARTER | | NO. |
| Hooker Chemicals and Plastics Corp. (Forme | | | | JUNE | | 02 |
| NUMBER AND STREET | CITY | | • | STAFF | | NO. |
| 322 W. Main Street | Moreno | i | | L. Koivun | iemi | 97 |
| | TITLE | | | COUNTY | | NO. |
| Richard Fredrick | Prod. St | ip t | | LENAVEE DISTRICT | | 16 No. |
| Chemical Production-Mixing 910f | 4 | | | | | ' |
| REMARKS: | | T | P | ANN ARBOE ROJECT | | 1 08 . I |
| Roy Schrameck, W.Q.D. #1, and I inspected | storage area | 01 | MAJOR S | OURCE | | |
| 6 which is south of the storage buildin | g next to the | 02 | MINOR S | DURCE | | |
| river. | | 03 | RESIDEN | | | |
| River - | NOD | 04 | | - CONFEREN | ÇE | |
| A A A A A A A A A A A A A A A A A A A | | 05 | TRAININ | G · | | |
| - X 6 1771 A | PCBS A | 08 | | | | |
| Storage 1 | | 09 | | | | |
| bldg | | 10 | | | | |
| | A | 00 | OTHER (e | explain) | | |
| Mrg bldg 12 | · | _ | SURVEY | ACTION | TYPE | 110 |
| There was no easy path to get back to the | fanas nasah ta | 01 | EMISSION | | ITPE | NO. |
| the river in storage area 6. First we | tried the south | " | INVESTIC | | | |
| and of storage area but drums and lab. | | 02 | VI\$IBLE,I | EMISSION | | |
| Saphazardly strewn made it impossible to g | et to the | | EVALUA' | FION | | |
| west side of this storage area via this pa | th. Finlly, | 03 | SOURCE | TEST (STAFF) | | |
| we got through by going along the south si | de of the storag | _{\$} 64 | SOURCE COMPA | | | |
| building and pushing in the fence to get t | o the west side | 05 | GRAB SA | • | | |
| of storage area 6 which is on a concrete | pad. | 06 | PICTURE: | | | |
| Mr. Fredricks and Lee Huffaker accompanied | Boy and ma whi | 1 | 1 | | | |
| we collected 4 samples from the ground-no | drums were | 10 | | | | |
| sampled. The drums which we were most con | cerned about | 11 | | | | |
| were two badly decomposed plastic lined fi | bpac barrels | 12 | | | | [|
| laying on their sides. One of which was 1 | eaking on to the | 13 | | | | |
| ground and had eaten into the wood that th | | 14 | | | · | · |
| placed on. The liquid was possibly a chrosubstance, since there was a greenish-yell | mic acid-like | 16 | -1,1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1- | | | |
| near these two barrels on the ground. Roy | ow material | 17 | | | | |
| before mentioned material; but, since it h | ad apparently | 18 | | | | |
| rained heavily the night before the sample | was probably | 19 00 | OTHER (e | volaie! | | |
| more diluted than it would have been if we | had collected | | | ANCE STATUS | | ==== |
| before the rain. There was evidence of ra | in because ' | Α. | IN COMPI | | | |
| the area was still wet, as it had just rai | ned. | В. | | N COMPLIANC | E ' | |
| When I had originally seen this contaminat | ad name of | C. | OUT OF (| COMPLIANCE N | TON | |
| area 6 on 6-15-82, there had been a lot | more multi- | | | CHEDULE | | |
| plored liquid on the ground. This likely | had been | D. | | FOULE MEET | ING | |
| ashed away by the recent rain. There was | evidence | <u>E</u> . | INCREA | MENTS KEDÜLE, NOT | | |
| that water washed directly from this stora | ge pad into the | ŭ. | | IEDOCE, NOT IG INCREMENT | TS. | |
| river, because there were obvious drainage | areas. Some o | Ĉμ | | EDULE, NOT | | . } |
| which were stained dark-not unlike an oil | slick. | | | IF MEETING | | |
| | - | | INCHEM | MEN 3 S | | į |

J. There HESUUNCES AIR QUALITY DIVISION ACTIVITY REPORT

| لــا | RECEIVED |
|------|---|
| | PERMIT ACTION |
| | ANNUAL COMPLIANCE INVESTIGATION COMPLETED |

| - 1 | NS |
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| | 147 |

SPS

REVISED STATUS

NESHAP

| AQ-42 | | | BATE I MANUELLE | 7777 | |
|--|-------------|--|-----------------|--|--------------|
| | | | DATE MM/DD |)/ Y Y | |
| ESTABLISHMENT | NO B OLO | <u> </u> | 06-22-82 | r | NO. |
| | NO. B-242 | _ | 4 | | 02 |
| Hooker Chemicals and Plastics Corp. (Formerly Par) | city | C81) | JUNE STAFF | | NO. |
| | { . | ~ 1 | 1 | | 97 |
| 322 W. Main Street | Moren | <u>. </u> | L. Koivuniemi | | У1 NO. |
| Richard Fredrick | Prod. S | un i t | LENAWEE | } | 46 |
| PRIMARY ACTIVITY | 1 1100. 0 | up c. | DISTRICT | | NO. |
| Chemical Production-Mixing | | | ANN ARBO | OR | 08_ |
| REMARKS: | | | PROJECT | Î | |
| Roy Schrameck, W.Q.D. #1, and I inspected storage | area | | SOURCE | | |
| 6. (Continuation Page 2) | | | SOURCE | | |
| 121 · (00111111111111111111111111111111111 | | 03 RESIDE | | | |
| | | | IG - CONFERENC | CE | |
| These areas of dark colored grass and soil may ha | ve been | 05 TRAINI | | | |
| stained by the company's Parco T-8 which had been | | 07 | | | |
| contained in small serosol cans (approximately 16 | | 08 | | | |
| size). Several piles of these aerosol cans were | | 09 | | <u> </u> | - |
| on the ground and most were corroded and empty; Pa | | 10 | | | |
| T-8 is an oil base lubricant similar to WD40. | | 00 OTHER | (explain) | | |
| | · | | | | |
| Many piles of the baghouse dust were exposed to t | he | SURVE | Y ACTION | TYPE | NO. |
| weather and was being washed away each time it ra | | 01 EMISSI | | | |
| | • | INVEST | FIGATED | | |
| The 70% ethylamine drum which was incorrectly sto | red open, | 02 VISIBL | | | |
| outside during earlier inspections had been moved | | EVALU | | | ļ |
| he storage building, but was still stored open a | nd was_ | | E TEST (STAFF) | | |
| almost empty. Disposal had been illegally accomp | | 04 SOURC | | | |
| by allowing this material to evaporate directly t | o the | } | PANY) | | |
| atmosphere. | | 05 GRABS | | | |
| | |) | RES TAKEN | | |
| I took pictures of Roy sampling and of the storag | e area | 09 | | | |
| | | 10 | | 1 1 | |
| | • | 11 | | | L |
| PCB's: | | 12 | | | |
| | | 13 | | | |
| Two samples of surface/contaminant collected 5-18 | | 14 | | | |
| storage area 🙆 had high levels of PCB's and chr | omium, | 15 | | | |
| sample #3 from area & was not as high: | | 16 | | | |
| A-1242 CR-Total | | 17 | | ······································ | |
| PCB ug/kg (ppb) mg/kg (ppm) | | 18 | | | |
| rep off the (bbn) mk/vk (bbm) | | | ₹ (explain) | | |
| Sample #larea 2 19,000 4,700 | | COMP | LIANCE STATUS | | [|
| 79100 | | A. IN CON | MPLIANCE | | <u> </u> |
| Sample #2area 2 2,500,000 2,500 | | B. UNKN | OWN COMPLIANC | CE | |
| 25 200 m 11 200 m 12 | | c. outo | F COMPLIANCE | NOT | |
| Sample #3area 3 6,500 37 | | ì | SCHEDULE | | |
| with the control of t | | D. ON A S | SCHEDULE MEET | ING | |
| Clean-up and Company Sampling: | | INCR | REMENTS | | |
| AND AND AND AND AND AND AND AND AND AND | | E. ONAS | SCHEDULE, NOT | | |
| Ther we collected our 4 samples and took picture | ട വി | MEE | TING INCREMEN | TS | |
| total as collected out a samples and took picture | | I ONA: | schilbut, Not | | |
| sociales than tolke much is made the attention pages. | erry Funtil | KNQ | WN H MEETING | | |
| i | | INCE | REMENTS | | |

DEPARTMENT OF NATURAL RESPRICES AIR QUALITY DIVISION

ACTIVITY REPORT

| COMPLAINT RECEIVED | NESHAP |
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| PERMIT ACTION | NSPS |
| ANNUAL COMPLIANCE INVESTIGATION | REVISED STATUS |

| COMPL | ETÉD | | | STATUS | | |
|---|-------------|------------|---|---------------|------------|-----------|
| AQ-42 | | | | | | |
| | | | | DATE MM/DD | /YY | |
| | | | | 06-22-82 | · · · | |
| • | NO B-2 | | | OUARTER | | NO. 02 |
| Hooker Chemicals and Plastics Corp. (Formerly Park | city | 38.1 |) | JUNE STAFF | | NO. |
| | | _ 3 | ĺ | | 1 | 97 |
| 322 W. Main Street | Morene | 21 | | L. Koivun | | 91 NO. |
| | == | - | | LENAWEE | | 46 |
| Richard Fredrick | Prod. S | oup | · C. | DISTRICT | | NO. |
| • | | | | ANN ARBO | | 08 |
| Chemical Production-Mixing | | | | ROJECT | 1 | |
| | omen | | · · · · · · · · · · · · · · · · · · · | | | |
| Roy Schrameck, W.Q.D. #1, and I inspected storage | area | | MAJOR S | | Ł | |
| 6 . (Continuation Page 3) | | 02 | MINOR S | | | . |
| Manager, Mr. Richard Fredricks; and Lee Huffaker, | Chemiet | 03 | RESIDEN | • | ~ F | |
| We requested and obtained as much of their operation | | 04 · 05 | TRAININ | G CONFEREN | CE. | |
| record as was available, i.e.: | r 11162 | 05 | THAIIVIN | 10 | | |
| record as was available, i.e | | 08 | | | | |
| (1) 24 Manifests of Waste shipped since May | 1982 | 09 | - | | | |
| (I) L4 MMILEOND OF MEDON SIMPLEM SIMO 1.00 | | 10 | *************************************** | | | |
| (2) 29 Generator's Waste Material Profile Si | neets | | OTHER (| [explain] | | |
| (2) 2) Concresor 5 was 90 mas | | | 0111211 | | | |
| (3) Logs of: Chemical waste to ship, trans | sfer | | SURVEY | ACTION | TYPE | NO. |
| record, and chemical waste a | | 01 | EMISSIO | N POINTS | | |
| shipped. | | | INVEST | GATED | | |
| onippou. | | 02 | VISIBLE | EMISSION | | |
| Much of the waste stored on the west side of area | <i>(</i> 6) | | EVALUA | ATION | | |
| near the river was not labeled and the company co | | 03 | SOURCE | TEST (STAFF) | | |
| not specifically identify it. The company promise | | 04 | SOURCE | TEST | | |
| -start immediately to contain all leaking waste | | | (COMP | ANY) | | |
| and test it to determine proper handling and disp | osal. | 05 | GRAB SA | AMPLE | | |
| -The company's operating record is much more defic | | 06 | PICTURE | ESTAKEN | | |
| then I had originally determined. | | 09 | | | | |
| | | 10 | | | | |
| Slowly, more and more information is dragged out | of the | 11 | | | | |
| -company concerning quality, quantity and location | _of | 12 | | | | |
| hazardous waste stored. The company has been les | s than a | :दश्य | rate | | | |
| -in answering my questions concerning their hazard | ousauo. | 14 | | | , | |
| waste activity and practices. | | 15 | | | | |
| | (CRA) | 16 | • | | | |
| After we had copies of their operating record (re | quired | 17 | - | | | |
| by Appendix I), I asked the company if they had | | 18 | | | | |
| | They | 19 00 | OTHER | (explain) | | |
| said no-absolutely not-not even in any transforme | rs becau | 3E - | the | IANCE STATUS | | |
| transformers had been tested. | | A | | PLIANCE | | |
| | | | | WN COMPLIANC | :F | L |
| Then Roy S. gave them a copy of the testing resul | ts of the | e | | COMPLIANCE | | |
| 3 samples we collected 5-18-82. The three offici | ais coul | ī., | | SCHEDULE | , 1 | |
| explain the chromium levels because the company v | ısed | Đ. | | CHEDULE MEET | ING | |
| Johnsmium; but the 2x5% PCB-A 1242 was not readily | | | | :MENTS | | |
| explained. We informed the company that they had | | Ε. | | CHEDULE, NOT | | |
| determine the extent of the contamination and the | | | | ING INCREMEN | TS | |
| of the PCB's, as well as clean up the contaminate | | F. | | HEDULE, NOT | | |
| environment, i.e. soils, river sediment and groun | ıd | | | IN IL MEETING | | |
| | | | | MENTS | | |

DEPARTMENT OF NATURAL REQUIRCES AIR QUALITY DIVISION

ACTIVITY REPORT

| COMPLAINT RECEIVED | | NESHAP |
|-------------------------------------|-------|-------------------|
| PERMIT ACTION | | NSPS |
| ANNUAL COMPLINVESTIGATION COMPLETED | IANCE | REVISED STATUS |

| | APLETED | | | STATUS | | | |
|---|--|----------------|---|---------------------------------------|-------------|-------------|--|
| AQ-42 | | | | DATE MM/DE | | | |
| V | | | | 1 . | | | |
| ESTABLISHMENT | NO. | | _ | 06-22-82 | | NO. | |
| | D−c | 422 | | | | | |
| Hooker Chemicals and Plastics Corp. (Formerly Parker Chemi | | | .) | STAFE | | 02 INO. | |
| | | | - | | ! | (' ' | |
| 322 W. Main Street | Morenc | i | | L. Kolvuni | emi_ | 07 No. | |
| Richard Fredrick | | | | | |]] | |
| PRIMARY ACTIVITY | Prod. S | rib. | * | DISTAICT | | NS. | |
| Chemical Production-Mixing Page 4 | | | | | _ [| | |
| REMARKS: | | T | = = - | <u>l ann ardo</u> Project | H | -08- | |
| | | | 1 MAJOR SOURCE | | | | |
| water if necessary. | | 02 | MINOR S | | 1 | | |
| The company agreed to have this area 6 cleaned | l up and | | | | | | |
| leaking or leaching waste in recovery drums by J | uly 6, | 04 | in the second control of the second control | | | | |
| 1982 and to have a study plan by approximately J | uly | 0.5 | TRAININ | - | | } | |
| 12 or 13 when the parent company's environmental | caudit is | 07 | | | | ļ | |
| conducted at the Morenci facility. | audit | 08 | | | | | |
| | | 09 | | | | { | |
| Source of PCB's ?: | | 10 | | | | | |
| | | 00 | OTHER (| explain) | | | |
| The company informed us that they use only inter | nally | <u></u> | | · · · · · · · · · · · · · · · · · · · | | | |
| generated waste oil for dust control; therefore, | , a | | SURVEY | ACTION | TYPE | NO. | |
| waste oil for dust control from an outside source | e was not | 01 | | N POINTS | | | |
| responsible for this PCB contamination. | | | INVESTI | GATED | | | |
| | | 02 | | EMISSION | | | |
| The company had transferred and stored Reacto-bo | ond (an | } | EVALUA | ATION | | | |
| oily product) in area 🔼 ; therefore, they will | T De | 03 | SOURCE | TEST (STAFF) | | | |
| checking to see if this product is contaminated | ALCU | 04 | SOURCE | | | | |
| PCB's through an inadvertent side reaction. | | | (COMP | ANY) | | | |
| (Col Do) DOD Ith he soid | that | 05 | GRAB S | AMPLE | | | |
| I called Dave Long (6-24-82), ESD Lab; he said | CHAC | 06 | PICTUR | ES TAKEN | | | |
| there was practically no chance there was a lab | erior, | 09 | | · · · · · · · · · · · · · · · · · · · | <u> </u> | | |
| Also, since total oil (FE-Oil) was 54,000 mg/kg | nnwowimate | 10 | | | | | |
| ppm or 5.4% that the oil in the sample #2 was approximate | | | | | L | L | |
| 46% PCB. | | | | | | | |
| - a state of out of | TTO C | 13 | | | | | |
| I also asked Dave to make sure chain of custody was | | | | | | | |
| maintained and to save these three samples indefinitely | | | | | | | |
| or until notice from Roy-since they were Roy's samples | | | | | | | |
| and may be important to either a civil or criminal | | | | | | | |
| enforcement case. | ······································ | 18 | | | | | |
| Company promised to save samples of liquid in t | he two | 19 | OTHER | (explain) | | | |
| badly decomposed plastic lined fiberpac drums, as well | | | | IANCE STATUS | | | |
| as their baghouse dust for me to pick up. The | | | | PLIANCE | | 1 | |
| company thought the liquid in these two barrels was | | | | WN COMPLIANC | DE: | | |
| CWM #66701. I tried to decode this by looking up | | | | COMPLIANCE | | | |
| Code 66701 on the Generator's Waste Management Material | | | = | SCHEDÜLE | - | | |
| - Socile Sheet, but the company had not given me | | | D. ON A SCHEDULE MEETING | | | | |
| is document. I have 66700 and 66702, but not 66701. | | | INCREMENTS | | | | |
| wars adequater. I have boloo and bolon, but no | | E. | E. ON A SCHEDULE, NOT | | | | |
| U.S. EPA Phone call of June 23, 1982: | | MEETING INCREM | | | TS | | |
| Up D. DIR I HUHO COLL OF UCHO CO. S. S./VC | | F. | ON A SCHEDULE, NOT | | | | |
| Received telephone call from Ms. Sally Swanson | of | | KNOWN IF MEETING | | | | |
| - The same of the | Service of the service | } | INCR | EMENTS | | | |

DEPARTMENT OF NATURAL POURCES AIR QUALITY DIVISION

| COMPLAINT RECEIVED | NESHAP |
|---------------------------------|-------------------|
| PERMIT ACTION | NSPS |
| ANNUAL COMPLIANCE INVESTIGATION | REVISED STATUS |

| | VVESTIGATION | HIVOL | | REVISED STATUS | | |
|--|--|-----------------|-----------------|---|-------------|-----------|
| AQ-42 | OMPLETED | | | (a. 75) 101/5 | 5000 | |
| | | | | DATE MM/D | | |
| ESTABLISHMENT | INO. B | | | 06-22-8 | | NO. |
| | В- | 242 | | | | 1 |
| Hooker Chemicals and Plastics Corp. (Formerly) | Parker Chemi | Cal | · | JUNE STAFF | | 02 NO. |
| 322 W Main Street | | | | L. Koivuniemi | | 97 No. |
| | Prod. S | Zavo I | + | LENAVE | ਨਾ | 46 |
| Richard Fredrick | | 144 | | DISTRICT | · d | NO. |
| Chemical Production-Mixing 950f | 5' | | | ANN ARI | BOR | عما |
| REMARKS: | , | | | PROJECT | | |
| Roy Schrameck, W.Q.D. #1, and I inspected stor. | age area | Q1 | MAJOR S | SOURCE | | |
| 6 . (Continuation Page 5) | | 02 | MINOR S | OURCE | 5 | |
| | | 03 | RESIDE | 4CE | | |
| · | <i>-</i> | 04 | MEETIN | G - CONFEREN | ICE | |
| U.S. EPA Region V, Chicago, Telephone (312) 88 | | 05 | TRAINI | 1G | | |
| She is assigned to write and coordinate the en | · · | 07 | | <u> </u> | | |
| or compliance order with the company. I promi | | 08 | | , <u>, , , , , , , , , , , , , , , , , , </u> | | |
| the information I obtained since June 14, 1982 within the next week | oli to ner | 10 | | | | |
| AT CUTTO-TITO TIGATO ACCUT | | 00 | OTHER | lev plain) | | |
| Telephone Call to Lyle Rowell of Environmental | | L | | expioniii | | |
| Enforcement Division on June 23, 1982: | | | SURVEY | ACTION | TYPE | NO |
| maror contain present on our our contains | | 01 | | N POINTS | | |
| I called Lyle to make sure he knew about: all | of my |] | INVEST | GATED ' | | |
| inspections at Hooker and the high levels of P | | 02 | | EMISSION | | |
| samples collected in area \triangle . Lyle confirme | d that | | EVALUA | ATION | | |
| there was no need for him to be involved in th | e sampling | 03 | | TEST (STAFF) | | |
| or meeting with Hooker on June 22, 1982. Sinc | e the compar | y 94 | SOURCE (COMP | TEST | | ļ |
| is cleaning up the barrels and agreeing to do | a hydro- | } | 1001111 | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |) i | |
| geological study and perform the subsequent en | vironmental | 05 | GRAB S | ES TAKEN | | |
| clean-up as necessary, it appears a criminal c | ourt case m | 09 | FICTOR | 23 PAREN | | |
| not be pursued. I will continue to inform Lyl | e or | 10 | | | | - |
| important findings which he may need. | | 111 | a nganggalagi | pagagapasan na biran | | |
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| | | 18 | | | | |
| | • | 19 | OTHER | lovolain) | | |
| may the company of the control of th | AND THE PROPERTY OF THE PARTY OF THE PROPERTY OF THE PARTY | | IANCE STATUS | | <u> </u> |
| | | A. | - | PLIANCE | | Ì |
| | | B. | | WN COMPLIAN | CE | • |
| | | C. | | COMPLIANCE | | |
| | | - | | SCHEDULE | | |
| A | | D. | | HEDULE MEET | ring | |
| | | | INCHE | MENTS | | |
| | | €. | ON A SC | HEDULE, NOT | | |
| | | | MERT | ING INCREMEN | 178 | |
| The control of the community of the control of the | | 1 | | HEDULE, NOT | | |
| | | | | IN IF MEETING | | |
| | | 1 | INCR | MENTS | | |

JUN 171982

WASTE MANLIGEMENT BRANCH Lindo/ journiemi EPA, REGION V

June 14, 1982

TO:

Al Howard, OHWM, MDNR

FROME

Linda Koivumiemi, A.Q.D.

SUBJECT:

Hooker Chemicals and Plastics, Morenci

RCRA AND ACT 64 VIOLATIONS

Attached ere:

- Three activity reports describing my recent RCRA (1) investigations to Hooker Chemicals and Plastics. Morenci.
- (2) A letter from John D. Kashner of Hooker dated June 1, 1982.
- RURA inspection report.
- (4) Draft EPA Compliance Order.

Please note in my three attached activity reports that this company has changed its story on more than one occasion:

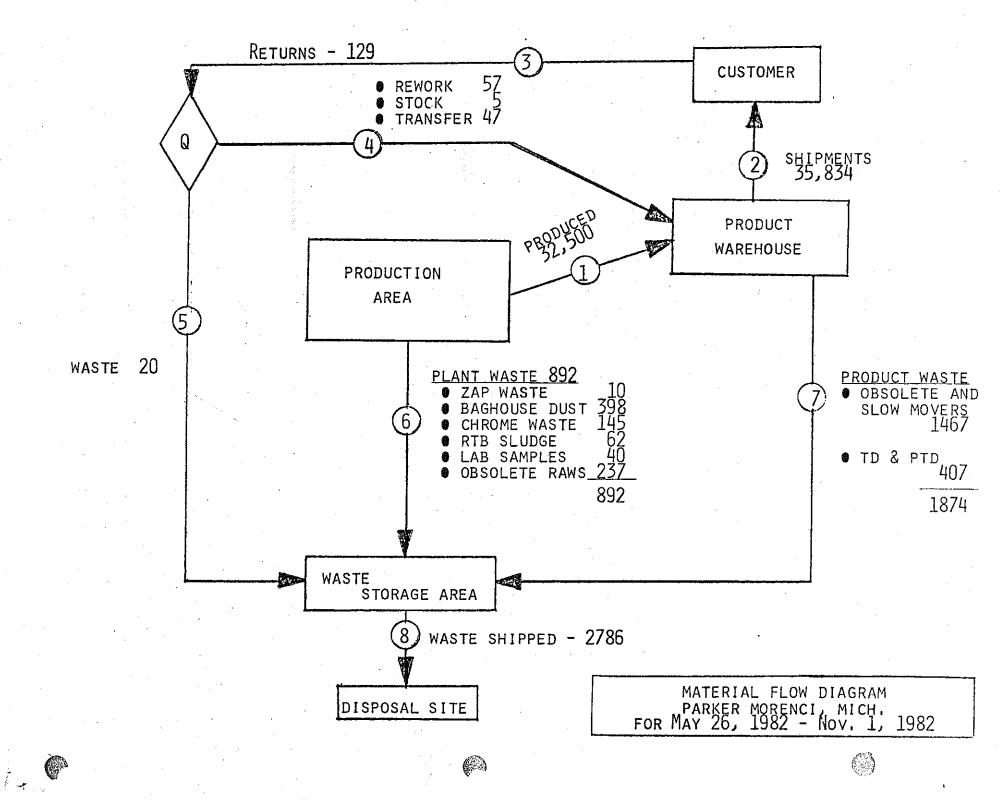
- At the beginning the hazardous vaste drums had been accumulating since April, 1981; then later the draws had been in storage prior to RCRA rules going into effect on November 19, 1980.
- (2) Also, at the beginning the company would not accept returned product/waste unless the company returning the unused material paid a fee of approximately \$120 per drum. Then, after I informed the company they were accepting unmanifested waste, they changed and said they accepted mused product back from the customer for credit.

It is my understanding that the Federal Register/Vol. 45, Sc. 229/Tuesday, November 25, 1980/Rules and Regulations, does not apply to the Hooker returned material because the returned product/waste is not regulated under 261.33, but hazardous based on its characteristics under Sub part C of 40 CFR 261.

Due to the serious violations caused by leaking and open hazardous waste drums, it is my belief that this company should be fined and issued the attached Compliance Order without further delay.

cc: Joe Boyle, U.S. EPA Region V (no attachments) sunt directly to Chicago from the Ann Arbor Air Quality Office.

LKK: vl



MORENCI MATERIAL FLOW DIAGRAM

PERIOD MAY 26, 1982 - NOVEMBER 1, 1982

The following paragraphs explain the material flow through the Morenci facility for the period May 26, 1982, to November 1, 1982. A diagram has been drawn which helps to illustrate the flow.

The time period, or "WINDOW", chosen was the period for which waste manifests show a total of 2786 containers of material transported off-site to a disposal site.

The window indicates the numbers of containers of products produced, product returned from customers, production waste generated and the total material disposed of from the facility.

During the window time period, the plant produced a total of 32,500 containers of product shown as Item 1 on the diagram. This product is either a named finished product, or new experimental products from Parker Research and Development. These experimental products are called "TD's and PTD's". All products are placed in the product warehouse, as shown, and then can be shipped to customers. Shipments to customers totalled 35,834 containers for the same period, (Item 2).

Some products are returned from customers to the plant as shown in Item 3. This is due to many reasons; experimental products which did not perform, finished products which became obsolete, excess inventory at a customer's plant which is not needed, shutdown of a customer plant or process, or products shipped in error to wrong customer or location. A total of 129 containers were returned during this time period (window).

The returned products are placed in a quarantine area for evaluation by quality control, designated by "Q" on the diagram. Products which can be reworked, repackaged or restocked are shown going to the product warehouse as Item 4, totalled 109 containers.

Products which are found to be incapable of rework are designated as waste and sent to waste storage, shown as Item 5, for disposal. A total of 20 containers were so designated during this period.

In addition, waste is normally generated in the production area. This consists of baghouse dust, incinerator ash, chrome area waste, laboratory samples, floor sweepings and product which does not meet specification as well as obsolete raw materials which cannot be used, or returned to vendor. These are shown as Item 6 on the flow diagram.

Other waste is generated in the product warehouse. This consists of obsolete products, TD's and PTD's which were stocked for customers, but never shipped and cannot be reworked. These are represented as Item 7.

The total waste stream, Item 8, is composed of Streams 5, 6, and 7 as shown. This is transported off-site by a licensed waste hauler to an authorized disposal site.

The total material flow, in summary, consists of the 2786 containers. Of these, 20 containers were from customer returns designated as non-returnable to production, 1874 containers from the product warehouse and 892 containers generated in the production area.

In summary, the waste disposed of from the facility was composed as follows for our "window":

| | CONTAINERS |
|---|-----------------------------|
| From Customer Returns, Item 5 *From Production, Item 6 From Product Warehouse, Item 7 | 892 |
| TOTAL WASTE DISPOSAL, ITEM 8 | 2786 |
| (*Detail breakout by category is on flow diagram.) | ery set with milk the const |

Total waste disposal containers of 2786 are 8.6% of total product produced

For customer returns, the summary is as follows, from the plant receivers:

- 5 Containers were restocked, Item 4.
- 57 Containers were reworked, Item 4.

(Item 1), during the time period reviewed.

- 47 Containers were transferred, Item 4.
- 20 Containers were scrapped as waste, Item 5.

The above numbers do not present a precise material balance, due to the short time period of the review, but are considered typical of the proportions produced at any "window" chosen as a moving tabulation of the various material streams. Due to the fact that we are looking at a moving window, lines (streams) will not necessarily be additive.

^{129 -} TOTAL CONTAINERS WERE RETURNED FROM CUSTOMERS, ITEM 3.

KEY TO LOG

- A. Chrome Waste
- B. Reactobond Waste (Sludge)
- C. TD's and PTD's (Experimental Product)
- D. Baghouse Dust
- E. Finished Product
- F. Raw Material
- G. Lab Retains
- H. Process Waste (ZAP-dilute zinc acid phos-phate, etc.)
- I. Floor Sweepings/Pad Sweepings
- J. Incinerator Ash

| KUKA | Inspection Report | |
|--|---------------------------------|----------------------------------|
| EPA Identification Number: <u>M</u> 1 D | 05872 | 3867 |
| stallation Name: Oxy Ue | tal Industries C | acparation (on Part |
| Location Address: 322 W. | Main St. | |
| City: Morenci | State: Mich. | |
| Date of inspection: Tri May 14 82 Tues. May 18 | Time of inspection (from) | 10A4 (to) 1PH us. May 27, 82 |
| | | |
| Pich and G. Fredrick | Title Production Superinterd | (S17) 458-2221 |
| Toyce Hutchison | Book Keeper | |
| Lee Huffaker | Chemist | 11 |
| Inspector(s) | Agency/Title | Tel ephone |
| Linda Koivaniemi | MDNR-AOD | (313) 665 9461 |
| <u>tallation Activity</u> (mark only one | Envir. Specialist | Inspection Form(s) |
| Treatment Storage Disposal per 40 Generation and/or Transportation | CFR 265.1 and/or | A |
| | neration or Transportation | n) A |
| ☐ Generation and Transportation | | B, C |
| □ Generation only | ne anake rija | etter operationer and the second |
| | | C |
| | | |

Change of name (Qw): Hooter Chemica and Plastics Corp.

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JUN 16 1982
ACT 64

Section A: SCOPE_OF_INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

| | Permit appli | catio | n process(es) (EPA Form 3510-3) Inspe | ection form / | 4 section(s) |
|-----|---------------|----------|--|---------------|--------------|
| | 501 | M | storage in containers | | I |
| | \$02 | X | storage in tanks | | J |
| | T01 | \prod | treatment in tanks | | J |
| | \$04 | П | storage in surface impoundment | | K,F |
| | T02 | П | treatment in surface impoundment | | K,F |
| | D83 | П | disposal in surface impoundment | | K,F |
| | \$03 | П | storage in waste pile | | L |
| | D81 | | disposal by land application | | M,F |
| • | D80 | | disposal in landfill | | N,F |
| | Т03 | П | treatment by incineration | | 0/P |
| · | Т04 | | treatment in devices other than tanks impoundments, or incinerators | , surface | Q |
| 0th | er activities | <u>s</u> | | | |
| | GENERATOR | X | | APPENDIX | GN |
| | TRANSPORTER | · II | en la companya de la companya de la companya de la companya de la companya de la companya de la companya de la La companya de la co | APPENDIX | TR |

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

None

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

None

| • 1 | | Section B: GENERAL FACILIT | Y STAN | (DARDS: | (Part | 265 Subpart B) | |
|-------------|-----------|---|--------|----------|---------------------------------------|-------------------------------------|-------------|
| | - | | YES | NO | NI* | Remarks | |
| 1. | | the Regional Administrator notified regarding: 265.12 | | · . | | | |
| | a. | Receipt of hazardous waste from a foreign source? | - | X | | | |
| • | ь. | Facility expansion? | | X | | | |
| | C• | Change of owner or operator? | | <u>X</u> | · · · · · · · · · · · · · · · · · · · | <u> </u> | |
| 2. | Gen | eral Waste Analysis: 265.13 | | | | | |
| | a. | Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | X | | | Determine from | |
| | b. | Does the owner or operator have a detailed waste analysis plan on file at the facility? | | | | spec. prat, -of obselete It testing | :£ |
| | c. | Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? | X | | | | |
| 3. | Sec | curity - Do security measures include (if applicable) 265.14 | : | • | | | |
| | a. | 24-Hour surveillance? | | X | | | |
| | b. | or i. Artificial or natural barrier around facility? and | X | | | forse | |
| ee este til | | ii. Controlled entry? | X | · | | gale | |
| ÷ | c. | Danger sign(s) at entrance? | X | | | | |
| · 4. | Own | ner or operator inspections: 265.15 | • | | | | |
| | a. | Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges | • | | | | |

of hazardous waste that may affect human health or the environment? *Now Inspected B-1

| | | ve an inspection schedule the facility? | χ. | | · | |
|-------------|---------------|---|----------------|-------------|---|---|
| | the | so, does the schedule address e inspection of the following ems: | nerii, eyttiis | | ti Line on sensing on the Line State of | |
| | i. | monitoring equipment? | | | <u>k</u> | Vone |
| | · ii. | safety and emergency equipment? | X | | , S | Vone est contained brand ire extinguish |
| | iii. | security devices? | Ø | | | |
| | iv. | operating and structural equip- ment (i.e. dikes, pumps, etc.)? | | <u> </u> | <u> </u> | JA |
| | ** V , | type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)? | | | X . | |
| | vi. | inspection frequency (based upon the possible deterioration rate of the equipment)? | _X | | \ | uly inspects |
| | | re areas subject to spills inspect- daily when in use? | er e series. | <u> </u> | Co | outsiner storage |
| • | an | es the owner or operator maintain n inspection log or summary of ner or operator inspections? | <u>X</u> | | | containers aly conce/wk |
| | | es the inspection log contain the lowing information: | | | ٥ | nly touce, wh |
| • • • • • • | i. | the date and time of the inspection | ? ** | arenggini | | |
| | ii. | the name of the inspector? | X | · · | | |
| • | iii. | a notation of the observations made? | X | · · | | hid not note |
| · | iv. | the date and nature of any repairs or remedial actions? | <u> </u> | | | very few- |
| Do p | | training records 265.16 | | | n | of environmenta cceptable |
| | a. Jo | ob titles? | <u>X</u> | | · · · · · · · · · · · · · · · · · · · | |
| | b. Jo | ob descriptions? | Τ. | 47-AB | | |
| * | | A - not applicable B-2 | | | • | A/82_h |

b. Does the owner or operator

| • | | · | 152 | NO. | . 11/1 | Kellid FK S | | • |
|----|-----|---|-------------|-----|-----------------------|--|------------|-----------|
| | с. | Description of training? | <u>X</u> | | | | | |
|) | d. | Records of training? | X | | | | | |
| - | e. | Did facility personnel receive the required training by 5-19-81? | X | | | espesificações de de la composiçõe de la composiçõe de la composiçõe de la composiçõe de la composiçõe de la c | | |
| | f. | Do new personnel receive required training within six months? | X | - | | • | | |
| • | 9. | Do personnel training records indicate that personnel have taken part in an annual review of initital training? | | | <u>\text{\lambda}</u> | Plan an an | | conducti |
| 6. | rea | required, are the following special quirements for ignitable, reactive, incompatible wastes addressed? 265. | 17 | | | | | |
| | а. | Special handling? | | X | · | Drums of | igun | tble work |
| | b. | No smoking signs? | X | | | | · E744 | ic wike / |
| | c. | Separation and protection from ignition sources? | Z | X | | Stored | <u>u</u> u | conerc |
|) | , | | · | | · · · | ignith | ole | weste |
| | | | | | | | | |

Section C: PREPAREDNESS AND PREVENTION: (Part 205 Subpart C)

| | Maintenance and Operation of Facility: 265.31 | VEC | NO · | N.T. | Remarks | <i>ب</i> ار |
|----|--|---------------|----------|----------|---|-------------|
| | Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | | · · | | leaking drums | |
| 2. | If required, does the facility have the following equipment: 265.32 | 2 | | - | | |
| | a. Internal communications or alarm systems? | | X | | None in storage | |
| | b. Telephone or 2-way radios at the scene of operations? | , | 7 | | telephone-inside | <u>.</u> |
| | c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | | <u> </u> | | sprinklers - inside | 2 W |
| | Indicate the volume of water and/or f | foam avai | lable | for f | ire control: | |
|) | Storage tack: | 50,0 545. | 00 | Sa | l H20 + | |
| 3. | Testing and Maintenance of Emergency Equipment: 265.33 | • | • | | | |
| | a. Has the owner or operator .established testing and maintenance procedures for emergency equipment? | X | | · | fire extinguis | ha |
| | b. Is emergency equipment maintained in operable condition? | X | - N N | | based on Company | ۲,۲ |
| 4. | Has owner or operator provided immediate access to internal alarms? (if needed) 265.34 | | _X_ | | |) (A |
| 5. | Is there adequate aisle space for unobstructed movement? | | X | <u> </u> | Tempory - problem | 10 |
| 6. | Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? | ٠ | | X | get draws move this month or To Not written | april . |
| | | C- | 1 | verb | al arrangeme 4/82-A | \ |

YES NO NI Remarks

Does the Contingency Plan contain the following information: 265.52

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
 - d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
 - e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

| \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ | The state of the second | n transmission of the state of | | | |
|---------------------------------------|-------------------------|--------------------------------|-----|----------|--|
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| X | | $\leq SVC$ | ~ C | ٠,٠ | |
| <u> </u> | | | | <u> </u> | |

| X | ###################################### | |
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| | | |
| χ | | |

X

X _ _ _

Site onlybut plan to send to five Chief and 4/82-pol

D-1

Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?
- 4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

| X | | • | |
|---|------|---------------|-----------------|
| | | , | |
| | | | |

| | | • | | | | |
|---|---|---|--|--|-----|--|
| 1 | / | | | | | |
| 1 | / | | | | 4.3 | |

10 date

-NI

YES NO

| off-5. | waste |
|-------------------|--------|
| . VV št System | 265.71 |

Use of Manifest System 265.71

- a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)
- b. Are records of past shipments retained for 3 years?
- 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72

Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.

- 3. Operating Record 265.73
 - a. Does the owner or operator maintain an operating record as required in 265.73?
 - b. Does the operating record contain the following information:
 - i. The method(s) and date(s)
 of each waste's treatment,
 storage, or disposal as
 required in 40 CFR Part 265
 Appendix I?
 - ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)
 - ***iii. A map or diagram of each cell or disposal area

| * * | only facil | applies | to | disposal |
|------------|---------------|---------|----|----------|
| | Taci | ities . | | |

no manifested

waste waste

waste waste

waste waste

returned protect

if it is disposed

by Hooker is

not a waste.

Remarks

yes except date

because of back log.

Prior to Dov. 19,

1980 of It is difficult

for the company to

determine quantity,

quality + tupe of all

waster in storage.

does not have any manifest for returned prote which is actually a waste E-1 which company 4/82-A receives payment for disposal in many cases.

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?
- v. Reports detailing all incidents that required implementation of the Contingency Plan?
- vi. All closure and post closure costs as applicable?
- 4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

- 5.**Unmanifested Waste Reports 265.76
 - a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?
 - b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

Most are available
but not well logged
and are difficult to
find.

None to date

Χ ____

Hooker will not give me this information. They do not want to be involved in blowing the whistle on their customers,

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

| * | X Carclain (CLOSURE AND PER | YES | | (Par NI | Remarks |
|---------|--|-------------|----------|-----------------|--|
| osure | ocr 112 | 11, 0 | 11(/ | | New Marks |
| | 265.112 | | | - ' | |
| | he facility closure available for inspection? | X | | | |
| Does | the plan identify: | | | | and the property of the second |
| | maximum extent unclosed dur- ing facility life? | X | | | |
| | maximum hazardous waste in- ventory? | X | · . | , | |
| iv. | estimated year of closure? | | | X | Does not know |
| ٧. | schedule of closure activities? | X | | Nep <u>land</u> | San San San San San San San San San San |
| . Has | closure begun? | | X | سيسمر | |
| ost-Clo | osure 265.118 | | • | | |
| | the post-closure plan available inspection? | | <u> </u> | | NA |
| . Does | s this plan contain: | | | | |
| i. | description of groundwater monitoring activities and frequencies? | | | | |
| ii. | description of maintenance activities and frequencies for | | | | D. K. |
| | AA. integrity of cap, final cover, or containment structures, where applicable | | | o tankingskit. | |
| | BB. facility monitoring equip- ment | | | | |
| iii. | name, address, and phone number of person or office to contact during post-closure care period | ? | | | |
| . Has | the post-closure period begun? | • | | | |

*Applies only to disposal facilities.

Is the written post-closure cost estimate available? 265.144.

G-1

| | | YES NO | N I: | Remarks |
|------------|--|------------|-------------|--|
| <i>†</i> - | Are containers in good condition? 265.171 | | | Some are being |
| | Are containers compatible with waste in them? 265.172 | X | - - - | Should have been |
| 3. | Are containers managed to prevent leaks? 265.173 | X | | |
| 4. | Are containers stored closed? | _ X | | even a 7030 ethylamable was |
| 5. | Are containers inspected weekly for leaks and defects. | X | | but corrections |
| * | Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). | 265.176 | X. | Lo leaking drums |
| 7. | Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177 | X _ | | said - no but due to lack of good records - I am not |
| 8. | Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | ₩ ¥ | | dismis of ignitible weste apan |

2. Types of autainers: 1051 - DOT 37M = 25h live 1009 - Steel drums

Section J = IANES (Part 265, Subpart J)

YES NO NI Remarks Are tanks used to store only those wastes which will not company contains it: cause corrosion, leakage or premature failure of the I not storing him. in tanks presently tank? 265.192 Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other con-NA - all are covered tainment structures? Do continuous feed systems have No continous foed a waste-feed cutoff? Are waste analyses done before the 265.193 tanks are used to store a substan-__X_ tially different waste than before? Are required daily and weekly inspections done? 265.194 6. Are reactive & ignitable wastes in tanks protected or rendered non-265.198 reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) Are incompatible wastes 265.199 stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing jgnitable or reactive wastes? neither Tank capacity: gallons ____feet \ Tank diameter:

4/82-A

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids

Distance of tank from property line

Code - 1977" to determine compliance.)

Section A: Scope

 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

| | | | YES | NO | NI | Remarks |
|------|-------------------|--|---------------------------|--------------|----------|------------------|
| (1), | | s the operator have copies of the manifest liable for review? 262.40 | - - | ٠ | | |
| (2) | mon | mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period. | کار د | - | OK | 39,81 |
| (3) | fol cop fes | the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21 | | | X¢ 2+ | - Shipmeha |
| | a. | Manifest document number? | X | | | |
| | b. | Name, mailing address, telephone number, and EPA ID number of Generator | X | | | |
| | c. | Name and EPA ID Number of Transporter(s)? | <u>X</u> | | | |
| | d. | Name, address, and EPA ID Number Designated permitted facility and alternate facility? | X | | | |
| • | e. | The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? | X | | | |
| | f. | The total quantity of waste(s) and the type and number of containers loaded? | <u>_X</u> | \ | | |
| | g. | Required certification? | -X | | . · . | |
| • | .h• | Required signatures? | X | | | |
| (4) | Rep | ortable exceptions 262.42 | | | | |
| | à. | For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility woment.) | e gen | erato | or has | NOT received a |
| 3 | b. | For manifests indicated in (4a), enter the | dimine Con & | er fo | or which | th the generator |

| • | YES NO N | 1 Remarks |
|---|----------------|--|
| is waste packaged in accordance | | |
| with pol regulations? | | based on |
| lequired prior to movement of lazardous waste off-site) 262.30 | χ | company's verbal |
| | -/-> | answer of yes |
| Are waste packages marked and labeled | | e. La principal de la principal de la principal de la companya de la companya de la companya de la companya de la |
| in accordance with DOT regulations concerning hazardous waste materials? | | |
| Reputined for movement of hazardous | 1 | based on company's |
| waste off-site) 262.31 262.32 | A = A | varbal answer of 155" |
| | | |
| If required, are placards available to transporters of hazardous waste? 262.33 | -X | hased - company |
| - the half of the transfer of | <i>6</i> ——— | verbal auswer of |
| | | «yes, |
| On-site accumulation of generated hazardous waste waste it generates either (A) in its storage fac | tes. A HWMF m | nay accumulate hazardous |
| with 40 CFR 262.34 [see 265.1(c)(7)]. Option B | restricts all | accumulation to tanks |
| and containers. If the installation elects opt to Section D. If the installation elects | ion A, check t | his box 📉 and skip |
| | | the following observa- |
| tions: See 40 CFR 262.34 January 11, 1982 Rev | ision | . 하는데 및 하다로 하는 경향하다. 그런 그는 그 모든 그는 그를 보는 그를 보는 것이다. 상대의 보통 기업을 받는데 그런 것이다. |
| a. Is each container clearly marked | | |
| with the start of accumulation | | |
| date? | | |
| b. Have more than 90 days elapsed since | | A Contract C |
| b. Have more than 90 days elapsed since the date inspected in (a)? | | THE STANDARD PARTY AND ASSESSMENT OF STANDARD STANDARD STANDARD STANDARD STANDARD STANDARD STANDARD STANDARD S |
| The same same same same same same same sam | | |
| c. Do wastes remain in accumulation tanks | • | |
| for more than 90 days? | | |
| d. Is each container and tank labeled or | | |
| marked clearly with the words "Hazardous | | |
| Waste"? | | |
| tion D: - RECORDKEEPING AND REPORTING (Part 262, | Subpart D) | CONTRACT AND STREET SURVEY SANDERS |
| ACOUNTY WE WELL THE WELL THE COLUMN | | |
| | YES NO | NI Remarks |
| Are all test results and analyses | | |
| needed for hazardous waste deter- minations retained for at least | | Ti / med |
| three years? 262.40 | | X I intermed |
| | | company of |
| <u>stion E: - INTERNATIONAL SHIPMENTS</u> (Part 262, Sub | ppart E) | this requirement |
| Has the installation imported or | | |
| exported Hazardous Waste? 262.50 | X | based on consent |
| (16 annual V | • | verbal answer |
| (If answered Yes, complete the following as applicable.) | | 01 "00" |
| | | . |
| Exporting Hazardous waste, has a | | |
| ## Nononator | | |

RCRA Inspection Report

| EPA Identification Number: M [C | 05972 | 3 2 6 7 | | | | |
|--|--|-------------------------------|--|--|--|--|
| Installation Name: Parker Chem | -46 | | | | | |
| Location Address: 32と い | Main St | | | | | |
| City: Morenci | State: MI | | | | | |
| Date of inspection: | Time of inspection (from) | 12:15 (to) 11:40 | | | | |
| | | | | | | |
| Person(s) interviewed | Title | Tel ephone | | | | |
| Richard Speed | Ey: Sp | | | | | |
| | | | | | | |
| | | | | | | |
| Inspector(s) | Agency/Title MDwk | Tel ephone 5/7 - 322 - 1602 | | | | |
| R. 6332 | USEPA | | | | | |
| Installation Activity (mark only on Treatment/Storage/Disposal per 4 Generation and/or Transportation | 0 CFR 265.1 and/or | <pre>Inspection Form(s)</pre> | | | | |
| Treatment/Storage/Disposal (no g | eneration or Transportation |) | | | | |
| Generation and Transportation | 경 <u>에</u> 하는 아님, 그는 사람들은 사람들은 사람들이 되는 것이 되는 것이 되었다. 그는 사람들은 사람들은 사람들은 사람들은 사람들이 되었다. | | | | | |
| | | B, C | | | | |
| ☐ Generation only | and the first of the second section of the section of the sectio | В, С | | | | |
| <pre> Generation only Transportation only </pre> | | B, C | | | | |
| Transportation only | and cubidity of Fo | B. | | | | |
| They rodace metal contags a | I testings The major | A Mah Co | | | | |
| Transportation only | I testings The major | A Mah Co | | | | |

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

| | Permit applicat | ion process(es) (EPA Form 3510-3) | Inspection Form A | section(s) |
|------------|-----------------------|--|-------------------|------------|
| | S01 T | storage in containers | | I |
| | so2 <u>T</u> |] storage in tanks | | |
| | то1 Т | T treatment in tanks | | |
| | s04 I | T storage in surface impoundment | | K,F |
| | T02 <u>T</u> | $oxed{	extstyle T}$ treatment in surface impoundment | | K,F |
| | D83 <u></u> | I disposal in surface impoundment | | K,F |
| | s03 <u>T</u> |] storage in waste pile | | L |
| | D81 <u> </u> | I disposal by land application. | | M,F |
| | D80 <u>T</u> | disposal in landfill | | N,F |
| RV. | <u> 1</u> 03 <u> </u> | treatment by incineration | | 0/P |
| | т04 | <pre>treatment in devices other than t impoundments, or incinerators</pre> | anks, surface | Q |
| <u>Oth</u> | er activities | | | |
| | GENERATOR I | | APPENDIX | GN |
| | TRANSPORTER T | | APPENDIX | TR |

- Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

| | 2.1 | Section B: GENERAL FACILI | IY SIAN | DARDS: | (Part | 265 Subpart B) |
|--|------------|--|---|--------------------------|-------|--------------------------|
| | | | YES | NO | NI* | Remarks |
| 1. | | the Regional Administrator n notified regarding: 265.12 | | | | |
| | a • | Receipt of hazardous waste from a foreign source? | | | | |
| | b. | Facility expansion? | | | | |
| | c. | Change of owner or operator? | - Company | - | | |
| 2. | Gen | eral Waste Analysis: 265.13 | | | | |
| | a. | Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | | | | Not are foundy for ned b |
| | b. | Does the owner or operator have a detailed waste analysis plan on file at the facility? | | | | Se convents |
| | C. | Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? | | · ··········· | | en Goe |
| 3. | Sec | curity - Do security measures include (if applicable) 265.14 | *************************************** | | | |
| . 1.7 | a. | 24-Hour surveillance? | | 1 James Marie | | ADT Algen so cans |
| The state of the s | b. | or i. Artificial or natural barrier around facility? and ii. Controlled entry? | 7 | | | |
| -11 J. W. F | c. | Danger sign(s) at entrance? | | | | |
| 4. | 0wn | er or operator inspections: 265.15 | • | | : | |
| | ā∙ | Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment? | | | | |
| 200 201 | | | | | | |

4/82-A

*Not Inspected

| 82 01 | hav | the facility? | <u>/_ `</u> | |
|----------------|--------|---|-------------|--|
| | the | so, does the schedule address e inspection of the following ems: | | |
| | i. | monitoring equipment? | <u> </u> | choiled by ADT |
| | ii. | safety and emergency equipment? | <u> </u> | |
| | iii. | security devices? | <u> </u> | |
| | iv. | operating and structural equip- ment (i.e. dikes, pumps, etc.)? | <u> </u> | Sirkan Seriki 24 di |
| | ν. | type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)? | | |
| | vi. | inspection frequency (based upon the possible deterioration rate of the equipment)? | <u></u> | |
| | | e areas subject to spills inspect- daily when in use? | | |
| | an | es the owner or operator maintain inspection log or summary of ner or operator inspections? | <u> </u> | |
| | | es the inspection log contain the lowing information: | | |
| | i. | the date and time of the inspection? | <u> </u> | |
| | li. | the name of the inspector? | | |
| e N | iii. | a notation of the observations made? | <u>/</u> | |
| | iv. | the date and nature of any repairs or remedial actions? | <u>/</u> | |
| Do pe inclu | 2 | training records 65.16 | | |
| s sen in | a. Job | titles? | | 2 550 NO. 10 TO 10 |
| | b. Job | descriptions? | | 8 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 |
| | | | | |

| | | | TES NO N | 1.5 | Kemarks | | |
|------|-----|---|----------|----------|--------------|-------------|-------------|
| . 4. | c. | Description of training? | <u></u> | | | | |
| | d• | Records of training? | <u> </u> | | | | |
| | e. | Did facility personnel receive the required training by 5-19-81? | | <u> </u> | | | |
| | f. | Do new personnel receive required training within six months? | <u> </u> | | New personel | vecies one- | Din - 01 |
| | g. | Do personnel training records indicate that personnel have taken part in an annual review of initital training? | | | | | |
| 6. | req | required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1 | 7 | | | | • |
| | ð. | Special handling? | | | | | |
| | b. | No smoking signs? | <u> </u> | | | | |
| | c. | Separation and protection from ignition sources? | <u>/</u> | | • | | · · |
| | | | | | | | |

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

| and the control of th | the state of the s | 그 하는데 어머니는 아이 하는 그 아이들을 위한 경험을 하면 되었다. 그릇이 나가 살아들이 되어 그 살 |
|--|--|--|
| Maintenance and Operation of Facility: 265.31 | WEG NO | |
| Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | YES NO | NI Remarks |
| If required, does the facility have the following equipment: 265.32 | | |
| a. Internal communications or alarm systems? | <u> 2</u> | |
| b. Telephone or 2-way radios at the scene of operations? | | |
| c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | | |
| Indicate the volume of water and/or fo | oam available | e for fire control: |
| Under while -en | 418 | |
| | | The state of the s |
| Testing and Maintenance of Emergency Equipment: 265.33 a. Has the owner or operator established testing and maintenance procedures | | They feet some, ADT does of |
| for emergency equipment? | 1/_ | The last some, Mul Jaco of |
| b. Is emergency equipment maintained in operable condition? | | |
| Has owner or operator provided immediate access to internal alarms? (if needed) 265.34 | 1/_ | |
| Is there adequate aisle space for unobstructed movement? | | |
| Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? | | |
| | C-1 | 4/82-A |

YES NO NI Remarks

Does the Contingency Plan contain the following information: 265.52

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

| _ | |
|---|--|

Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?
- 4. Emergency Procedures 265.56

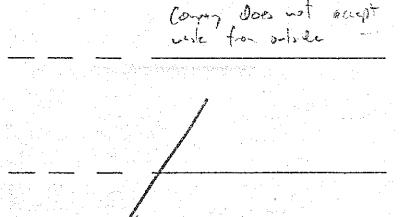
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

| | | | . 4 | | | f 41 1 | 1.4. | |
|---------------------------------------|---|------|-----------------------|-------|-------------------|--------|----------|----------|
| | | | ng Palacas La Saga | | ng-Lagarin kengan | | | AT L |
| | 1 | | | . * . | | | | |
| · · · · · · · · · · · · · · · · · · · | | | | | | | | |

YES NO NI Remarks

Use of Manifest System 265.71

- a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)
- b. Are records of past shipments retained for 3 years?
- ** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72
- ** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.
 - Operating Record 265.73
 - a. Does the owner or operator maintain an operating record as required in 265.73?
 - b. Does the operating record contain the following information:
 - i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?
 - ii. The location and quantity of
 each hazardous waste within the
 facility? (This information
 should be cross-referenced
 to specific manifest number,
 if waste was accompanied by
 by a manifest.)
 - ***iii. A map or diagram of each cell or disposal area



All stone

*** only applies to disposal facilities

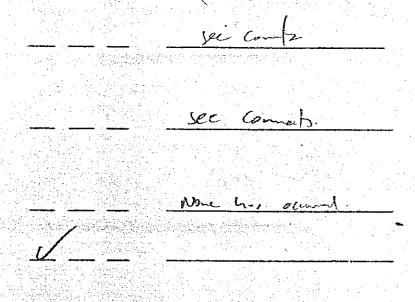
4/82-A

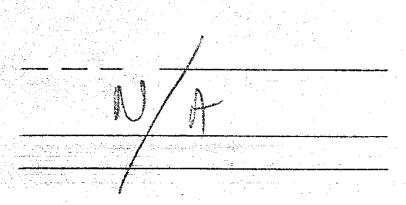
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?
- v. Reports detailing all incidents that required implementation of the Contingency Plan?
- vi. All closure and post closure costs as applicable?
- 4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

- 5.**Unmanifested Waste Reports 265.76
 - a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?
 - b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.





^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

| | Section I - USE AND MANGEMENT OF | CONTAINERS (Part 265 | 5, Subpart I) |
|----------|--|----------------------|------------------|
| | | YES NO NI | Remarks |
| 1. | Are containers in good condition? 265.171 | <u> </u> | |
| ¥. | Are containers compatible with waste in them? 265.172 | | |
| 3. 4. | Are containers managed to prevent leaks? 265.173 Are containers stored closed? | | |
| 5. | Are containers inspected weekly for leaks and defects. | | |
| 6. | Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). | 265.176 | Ove draw only. |
| 7. | Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177 | | iopertent of blu |
| 8. | Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | | |

Section A: Scope

 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

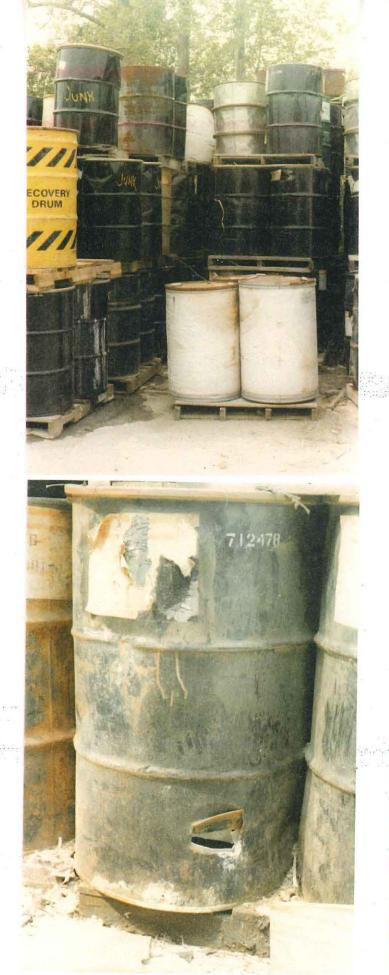
| | | | YES | NO NI Remarks |
|-----|---------------------|--|------------------|--|
| (1) | | the operator have copies of the manifest lable for review? 262.40 | <u> </u> | |
| (2) | mont | nine manifests for shipments in past 6 ths. Indicate approximate number of fested shipments during that period. | 16_ | |
| (3) | fold cop fest | the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manical that do not contain the critical ments). 262.21 | | |
| | a. | Manifest document number? | | |
| | b. | Name, mailing address, telephone number, and EPA ID number of Generator | <u>_\u03a4</u> | |
| | c. | Name and EPA ID Number of Transporter(s)? | _/ | |
| | d. | Name, address, and EPA ID Number Designated permitted facility and alternate facility? | <u> </u> | |
| | е. | The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? | <u></u> | |
| | f. | The total quantity of waste(s) and the type and number of containers loaded? | <u> </u> | |
| | g. | Required certification? | | |
| | h- | Required signatures? | | |
| (4) | Rep | ortable exceptions 262.42 | - | |
| | a. | For manifests examined in (2) (except for enter the number of manifests for which signed copy from the designated facility ment. | the ge | nerator has <u>NUI</u> received a |
| | b. | For manifests indicated in (4a), enter thas submitted exception reports (40 CFR tor. | he num 262.42 | ber for which the generator) to the Regional Administra- |

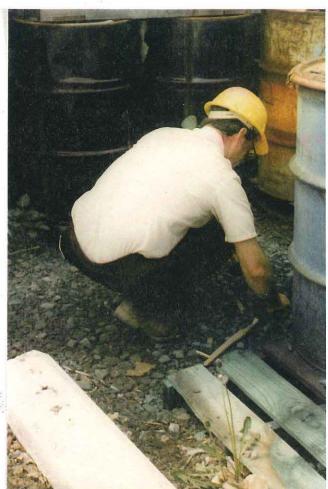
| Sect | i Lion | C: PRE-TRANSPORT REQUIREMENTS (Part | 262, Subpar | t C |) (| | | | |
|-----------|---------------------|---|---|--|---------------------------------------|---------------------------------------|--------------------------------|-------------------------------|---------------------------------------|
| | | | | ES | 1.00 | NI | Remarks | | |
| 1. | | aste packaged in accordance DOT regulations? | | | | | | | |
| | (Rea | uired prior to movement of rdous waste off-site) 262.30 | _1 | | | | | | |
| 2. | in a conc (Req | waste packages marked and labeled coordance with DOT regulations erning hazardous waste materials? uired for movement of hazardous e off-site) 262.31 262.32 | | | | | | | * * * * * * * * * * * * * * * * * * * |
| 3. | | equired, are placards available to sporters_of hazardous waste? 262.3 | 3 | | | <u></u> | | | |
| 4. | wast with and | ite accumulation of generated hazard e it generates either (A) in its sto 40 CFR 262.34 [see 265.1(c)(7)]. (containers. If the installation elec- ection D. If the installation elec- is: See 40 CFR 262.34 January 11, | orage facili Option B resects option is option B, | ty tri A, co | [265. cts a check | l(b)] ll ac this | or (B) cumulation box [] | in acco on to to and sk | rdance anks ip |
| | a. | Is each container clearly marked with the start of accumulation date? | | Company of the Compan | | · · · · · · · · · · · · · · · · · · · | | | |
| | b. | Have more than 90 days elapsed since the date inspected in (a)? | <u></u> | | · · · · · · · · · · · · · · · · · · · | | 52. | <u></u> | |
| | c. | Do wastes remain in accumulation ta for more than 90 days? | rks - | , . | · · · · · · · · · · · · · · · · · · · | | | | · · · · · · · · · · · · · · · · · · · |
| | d. | Is each container and tank labeled marked clearly with the words "Haza Waste"? | | -3 <i>2</i> | | . <u></u> | | | |
| Sec | tion | D: - RECORDKEEPING AND REPORTING (P | art 262, Sul | opar | t D) | | · | | |
| | nee min | all test results and analyses ded for hazardous waste deter- ations retained for at least ee years? 262.40 | | YES | NO : | osi ni | Rema | arks | |
| Sec | tion | E: - INTERNATIONAL SHIPMENTS (Part | 262, Subpar | t E |) . | | . | | |
| 1. | | the installation imported or orted Hazardous Waste? 262.50 | | | 0 | | - - | · | |
| 10 | | answered Yes, complete the following applicable.) | ng | | , | | | | |
| | a. | Exporting Hazardous waste; has a generator: | | | | | | | |
| | ٠, | | GN-2 | | | | | | 4/82-A |



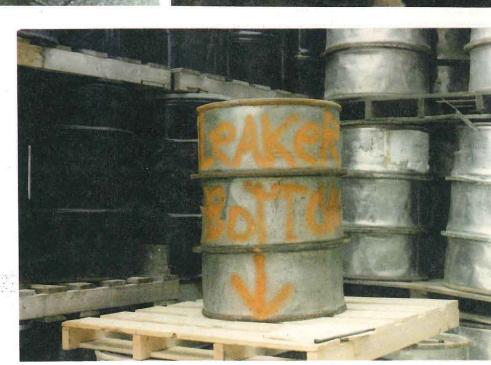






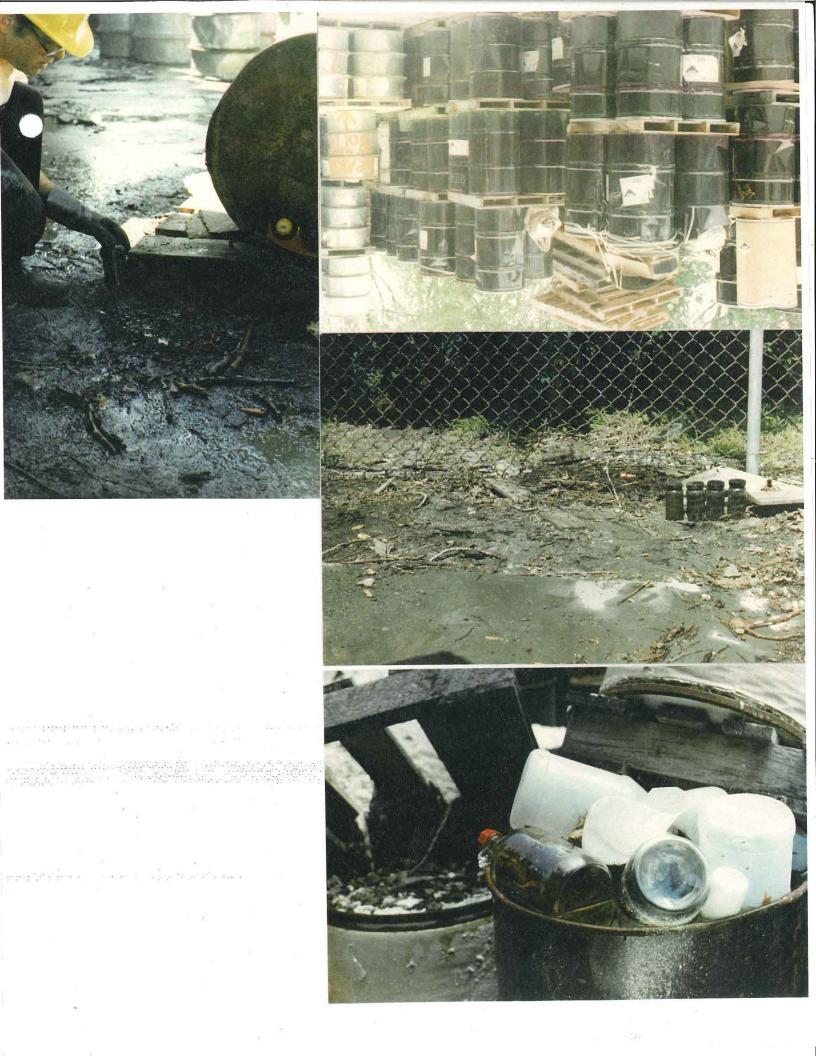










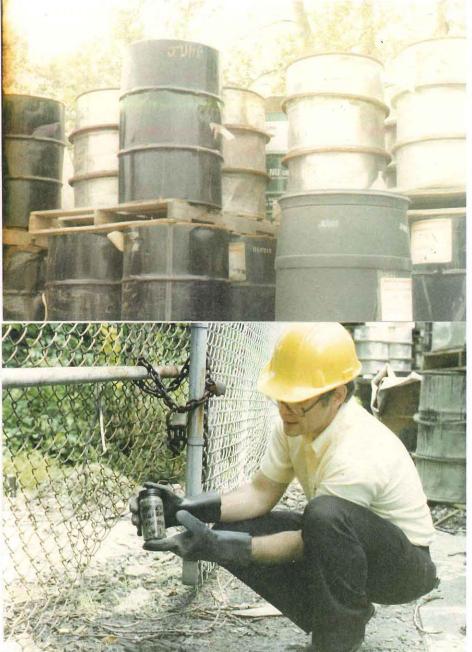




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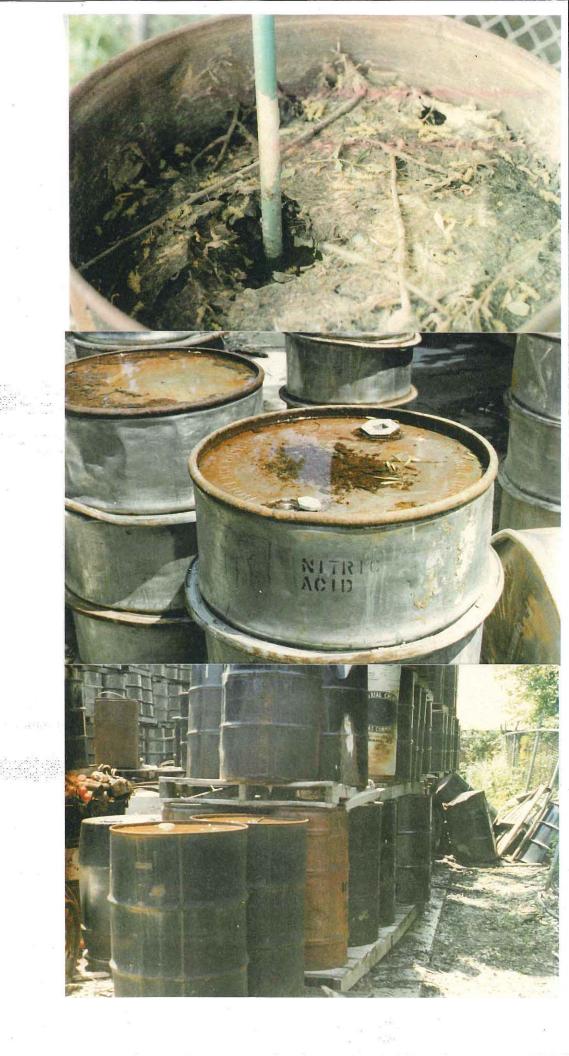


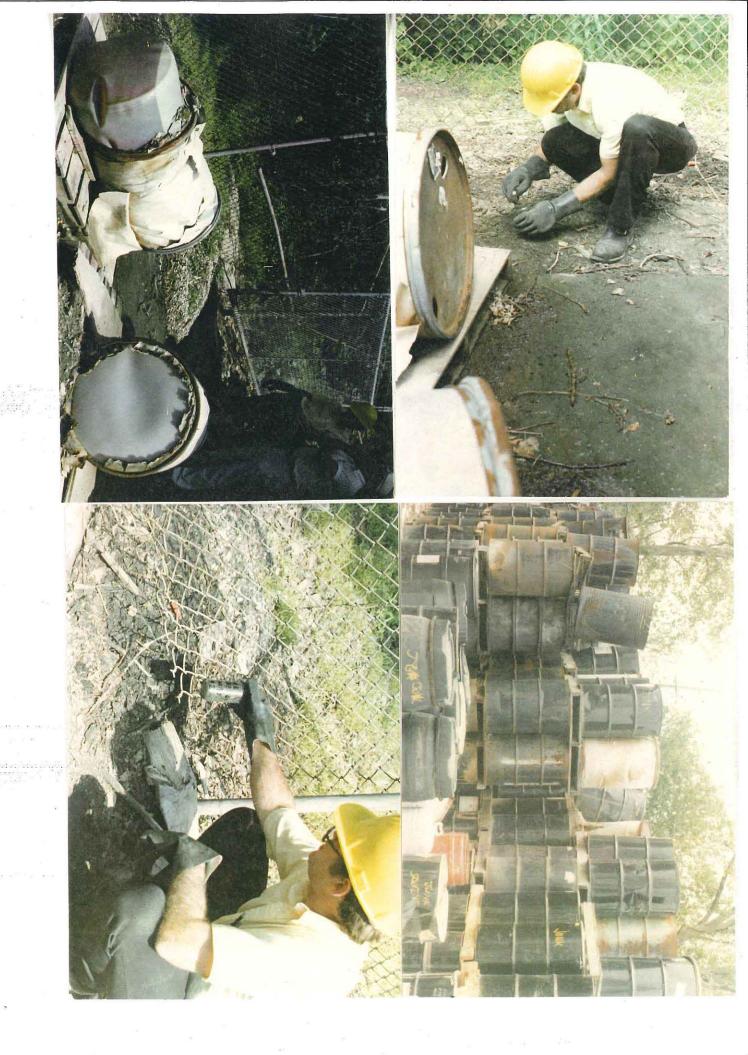


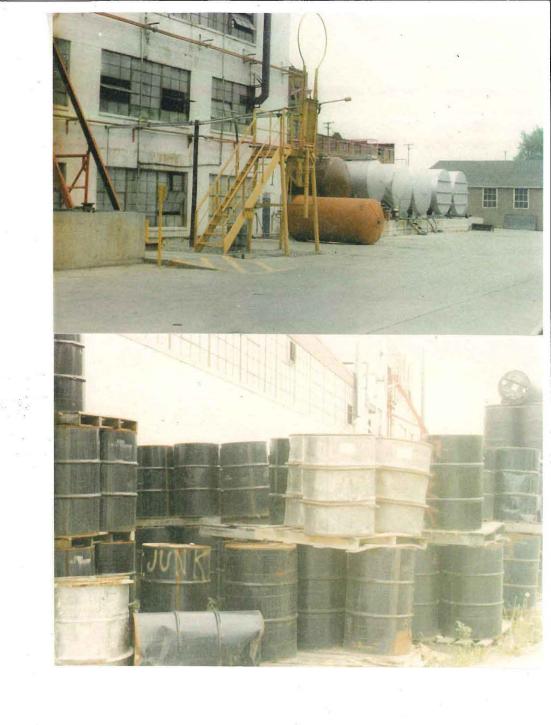














Staff Report

Occidental Chemical Corporation
Parker Surface Treatment Products Division
322 Main Street
Morenci, Michigan

Linda Koivuniemi, DNR Air Quality Division, conducted a RCRA inspection at Occidental Chemical in Morenci on May 14, 1982. There were numerous violations of the RCRA regulations surfaced as a result of that in inspection. Linda noted that the storage area was generally in poor condition with what appeared to be chemical residues on-the ground surface, leaky drums and indications of overland runoff from the storage area to Bean Creek on the west property line of the company. As as result of these observations, Linda contacted the District I Water Quality Division office on May 17, 1982 and dicussed the potential groundwater and surface water problems associated with the site with the writer. We agreed to meet at Occidental Chemical on May 18, 1982 so that I could evaluate the situation with regard to potential groundwater and/or surface water contamination and possible violations of Act 245, P.A. 1929, as amended.

May 18, 1982

I met with Linda and she furnished me with a copy of the company's Part A RCRA application and reviewed her observations of May 14, 1982. Linda and I then went to Occidental Chemical and met with Mssrs. Richard Fredrick and Richard Speed and advised them that Linda was doing a follow-up/continuation regarding the RCRA inspection and that I would be inspecting the site relative to possible Act 245 violations. We requested, and received, permission to inspect the drum storage areas, take pictures and possibly collect some samples off the ground in the storage areas. Permission was granted verbally by Mr. John Kashner, Manager-Manufacturing, Occidental Chemical.

All the drum storage areas were undiked and four of the six areas were on stone or unprotected earth. With reference to the attached site drawing (attachment I), the storage areas are described below:

- 1 Located at the northwest corner of the manufacturing building on a crushed stone base. This area contained an estimated 200 drums + 5%. Approximately 10% of the drums were damaged but there were only minimal indications of any leakage onto the ground. At least one drum had the outer metal completely rusted out and the remaining "drum" was empty.
- 2 This area is located just north of the new drum storage bmilding on a concrete pad. The pad was covered with "dirt" and leaves. There were approximately 1536 drums + 5%, of which about 25% appeared to be damaged and/or leaking. Several drums had chemicals on the outside indicating leaks from the drums. There was "oilly" residue soaked into the leaves and dirt on the pad

and indications along the fence line that some minor runoff might have occurred to Bean Creek. The drum stacks were haphazard and disorganized with some of the top drums falling over against adjacent stacks. There was liquid on the ground inside the drum stacks but there was no way to get into the area.

- 3 The fence on the north side of the plant driveway bisected a group of waste drums referred to as area 3. These drums were stacked on crushed stone and there were several discolored areas indicating leakage from the drums. There was an estimated 400 drums ± 20% in this area with about 40% of the drums opened, damaged or leaking.
- 4 This area was inside the warehouse on the east side of the property near the shipping/receiving area. No estimate of the number of drums was made at this location.
- 5 This area was north of location #2 and contained approximately twelve drums of waste materials. In addition there were several "empty" drums stacked on their sides to the east of the waste drums. These drums had contained chromic acid and residual pools of brownish liquid from the rinsing operations were collected in the drum grooves. At least two of the waste drums had no tops and there was no concrete pad under any of the drums. The drums were resting on bare ground. This area was not identified in the RCRA Part A form.
- 6 This area located just south of the new storage building was not identified on the RCRA Part A either. The estimated 15 waste containing drums were stacked next to some empty drums on the concrete.

The total estimated drum inventory on hand on May 18, 1982 was as follows:

Area 1 - 200 \pm 5%

Area 2 - 1536 ± 5%

Area 3 - $400 \pm 20\%$

Area 4 - not estimated

Area 5 - 12

Area 6 - 15

Total drums - 2163

Note: The <u>+</u> range on the estimate is to compensate for interior voids in the drum stacks and irregular stacking.

Following our inspection of the drum storage areas, Linda and I met with Mssrs. Fredrick and Speed and we discussed various aspects of RCRA and Act 245 regulations. I told the company respresentatives that the storage

areas had to be cleaned up and that it would probably be required that they conduct a hydrogeological investigation at the site to determine if any groundwater contamination had occurred at the site. This advisory was based on the drum storage area conditions and on the past practices the company was using to drain their tank truck loading hoses.

The outside loading area for tank truck shipments is located in about the middle of the west side of the manufacturing building. For at least the last 10 years the company has been draining and rinsing delivery hoses into a stainless steel drum sunk partially into the ground. Reportedly, the bottom had been cut out of the drum and the drum then filled with crushed stone. The waste material being discharged to the drum would have contained primarily chrome, nickel and zinc phosphate compounds. I advised the company that this practice was illegal and that they should cease the operation immediately.

In our discussion with Mssrs. Fredrick and Speed, I found out that the drums were primarily "product no longer usable" that had been returned to Occidental by their customers. The drums in the yard, which they contented were \pm 900 in number, had been accumulated reportedly since April 1981. The company had a contract with Chemical Waste Management in Alabama and would be shipping the drums out after characterisation was completed. Monies had already been allocated and the lab work was reportedly done. The company expected to ship the first load out May 26, 1982 and be completed with the removal by the end of June 1982.

The company was characterising the materials in the drums by company drum code. The code is a nine digit number; the first of which is the last number of the year the product was manufactured, the second is the plant area in which the product was manufactured, and the last four, the product batch number. The company was not sampling each drum but would randomly select single drums of the same code number to analyse. They were not running complete analysis on the drum samples but were analysing for characteristics, i.e., percent phosphate, that should have been in that product code number. If the analyses was within acceptable analytical error, they were assuming no other material had been introduced into the drum. The company, in reality, had no way of knowing if the drums had been tampered with or what was in the drums when they accepted receipt of them and put them in the storage yard. Many of the drums were so badly rusted that no product code or company name could be found.

In the future the company intends to store returned product in a "quarantine area" in building H. The drums will remain in this inside storage area until they are analysed and the company decides whether to return them to "stock", rework the material into a different product, or dispose of the drum contents as a waste. Waste drums will be stored in the new storage building with a maximum inventory of 80 drums.

After our discussion with Mssrs. Fredrick and Speed, Linda and I went back out to the storage area to take pictures and collect samples. I collected three samples in the storage area. These samples were collected by scrapping the ground surface and depositing the material into a clean glass jar. The samples were transferred to the Environmental Services Division Laboratory on May 19, 1982. Custody was maintained on all samples. The sample locations and results were as follows:

| Sample | # | Location | | yanid mg/kg | | Chromium Mg/kg | Copper Mg/kg |
|--------|---|-------------------------|--------|----------------|---------------|------------------------|-----------------|
| 1 | | Northwest area of area | #2 | | 3 | 4,700 | 100 |
| 2 | | Southeast area of area | #2 | | k2 | 2,500 | 140 |
| 3 | | Southcenter area of are | ea #3 | NAV | k2 | 37 | 190 |
| | | Nickel | Lead | ٠ | Zinc | Oil and Gre | ase |
| | | (Mg/kg) (| Mg/kg) |) | (Mg/kg) | (Mg/kg) | |
| 1 | | 67 | 100 | | 3800 | 30,000 | |
| 2 | | 170 | 170 | | 4800 | 54,000 | |
| 3 | | 30 | 14 | | 170 | 1,300 | |
| | | PCB (A-1242) (ug/kg) | I | PCB (A | -1254) kg) | PCB (A-1260 (ug/kg) |)) . |
| 1 | | 19,000 | | k20 | 00 | k2000 | |
| 2 | | 2,500,000 | | k20 | 00 | k2000 | |
| 3 | | 6,500 | ٠ | k20 | 00 | k2000 | |

Note: k means "less than"

NAV means "requested analysis not available"

May 27, 1982

I returned to Occidental Chemical on May 27, 1982 with Linda. The purpose of the visit was to collect some "random" drum samples from the storage are as we were not equipped with the necessary materials for drum sampling during our May 18, 1982 inspection. We met with Mssrs. Kashner and Fredrick again and also with Mr. Lee Huffaker. Samples were collected from four drums and transferred to Linda for transmittal to the ESD laboratory. Custody was maintained on all samples. I collected duplicate samples for the company at the same time. The locations and analytical results for the four samples were as follows:

Sample #1 - This sample was collected from a 55 gallon drum marked "Junk Solvent" located in storage area number 2. The dark colored liquid was too "thin" to collect in a sampling tube, so I lowered a small bottle into the drum and transferred the sample

to a clean glass container. The liquid had a "solvent" type odor and Mr. Huffaker indicated that it probably contained waste solvent used by Occidental. Analysis of the sample showed:

Flash point - less than 70° F pH - 3

The material was characterised by the ESD laboratory as being a "mixture including ethyl benzene and xylenes".

Sample #2 - A highly corrosive red liquid was sampled from a 55 gallon drum located in area number 2. The liquid surface etched the metal tube, presumably aluminum, that we were using to collect the sample. The sample was collected in a polyethylene bottle supplied by Occidental Chemical due to their concern for possible presence of hydroflouric acid. The drum, labled 615473, was identified by the company as PARCO cleaner. Analysis of the sample showed:

pH - 1

Sample #3 - A sample was collected from a 55 gallon drum in area number 3 labled Ethylamine 70%. The sample had a strong ammonia odor despite the fact that Mr. Fredrick had opened the drum in April 1982 to relieve pressure build-up in the drum. The sample was collected using a metal tube and deposited in a Occidental Chemical supplied polyethylene bottle. Analysis of the sample showed:

Flash point - less than 40° F pH - 14

The material was characterised by the ESD laboratory as containing a trace of xylene.

Sample #4 - A 55 gallon drum covered with a wax like substance on the outside was located in area number 3. A sample of the brown-yellow viscous liquid was collected using a metal sample tube and deposited in a clean glass bottle. Analysis of the sample showed:

Flash point - approximately 190° F pH - 3

ESD laboratory characterisation of the sample indicated the presence of tolyene, ethylbenzene and xylene. Analysis for PCB showed:

A-1242 - less than 4000 ug/l

A-1254 - less than 2000 ug/l

A-1260 - less than 2000 ug/l

Arter we collected the drum samples we met with Mssrs. Kashner, Fredrick and Huffaker to discuss additional RCRA information that Linda needed. During our disucussion, Lee Huffaker indicated that he felt some of the stored material would not have needed to be manifested under RCRA because it had been returned prior to November 19, 1980 when RCRA regulations took affect.

June 22, 1982

Linda and I met with Dick Fredrick, Lee Huffaker and John Kashner to discuss the PCB results obtained in our May 18, 1982 samples, collect additional RCRA information and inspect the storage area that Linda discovered during her June 15, 1982 inspection.

Linda once again requested a copy of Occidental's operating record under RCRA. The company indicated they were still working on putting the information together. The record would not be done until all materials were shipped out to Chemical Waste Management. Linda then requested copies of all the waste characterisation Reports being compiled for Chemical Waste Management. The company responded by stating that about 80 drums had not been characterised yet because they could not get any markings off the drums but that samples from these drums had been shipped to the company's lab for analysis the previous week.

The company stated that the new storage area Linda had discovered behind the empty stainless steel drums in area 6, contained sample bottles from lab samples that someone had deposited in the area contrary to established procedures and two drums of liquid that no one knew anything about. The remaining drums contained "bag house" dust from the air scrubbers at the plant.

Linda and I inspected the expanded number 6 storage area. Several attempts were made to penetrate through to the waste area in question without success. We finally gained access by going along the south side of the new storage building and pushing the west property line fence back and squeezing between the fence and the drums to gain access to the west portion of area 6.

The area was generally a mess with deteriorated fibre paks of "bag house" dust having lost their contents all over the concrete pad. There were several open top drums of plastic bottles that Mssrs. Fredrick and Huffaker said were discarded lab sample bottles. When we entered the area, I could hear a hissing sound from one of the barrels. Two fibre pak type barrels with plastic liners had fallen over and the outside shell was deteriorated. Leakage from one of the fibre pak barrels had eaten through the wooden pallet it was resting on and had partially dissolved the cement at the edge of the pallet. There were definite dark colored stains leading from the storage area, under the fence and toward Bean Creek. At least two open top barrels contained rusted, disintegrated aerosol cans once containing material similar to WD-40.

Ground surface samples were collected from locations in this area as follows:

- Sample #1 Southwest of gate along west fence line--just east of fence
- Sample #2 Oilly area outside fence line about 10 feet southwest of sample #1
- Sample #4 Greenish yellow stained material below fallen over fibre pak. This area would have runoff tributary to sample site #3. Fibre pak with label still on it next to sample location indicated "corrosive" and contained brownish colored liquid

Analysis of the above samples showed the following:

| Parameter | <u>#1</u> | #2 | <u>#3</u> | #4 |
|------------------------|-----------|--------|-----------|--------|
| Oil and grease (mg/kg) | 68,000 | 37,000 | 18,000 | 2,300 |
| PCB A-1242 (11g/kg) | k200 | k200 | k200 | k200 |
| A-1254 (ag/kg) | k200 | k200 | k200 | k200 |
| A-1260 (ng/kg) | k200 | k200 | k200 | k200 |
| Cadmium (Mg/kg) | 5 | 7 | 6 | 3 |
| Chromium (Mg/kg) | 640 | 1,000 | 14,000 | 36,000 |
| Copper (Mg/kg) | 1,100 | 2,300 | 2,100 | 400 |
| Nickel (Mg/kg) | 31 | 250 | 61 | 280 |
| Lead (Mg/kg) | 310 | 330 | 290 | 220 |
| Zinc (Mg/kg) | 11,000 | 57,000 | 12,000 | 3,600 |

Note: k means less than

Since the fibre pak barrels and the stainless steel drum marked "nitric acid", source of earlier noted hissing sound, could not be safely sampled during our inspection, the company was requested to collect samples for us once the barrels were in recovery drums and the "nitric acid" drum was depressurised.

Mssrs. Kashner, Fredrick and Huffaker were instructed that this "new" storage area must be cleaned up immediately. They were also told that any outside storage of raw materials or wastes must be curbed and/or diked and must be on an impervious pad.

We asked Mssrs. Kashner, Fredrick and Huffaker about storage or use of PCB's on the Occidental property. They emphatically denied the presence of any PCB in either hydraulic or electrical systems and stated that the systems had been tested and showed no detectable PCB. We then informed them of the PCB analysis from our May 18, 1982 samples. After some dis-

cussion, the company personnel reluctently agreed that someone could have returned a drum to them that contained other than their product and that in reality they had no way of knowing what was in <u>all</u> the drums in the storage area.

I told the company that we wanted them to do a study of the sediments and water in Bean Creek above and below their facility for organics, phosphates and metals and a hydrogeological study to determine groundwater quality and flow direction. The study plan was to be internally discussed with Occidental's corporate environmental personnel during a planned July 12-13, 1982 environmental audit with a letter being sent to us by July 23, 1982 committing to the study and giving us a date for a plan submittal. The south storage area (#6) that we had sampled was to be completely cleaned up by July 16, 1982.

Mr. Richard Speed from Occidental subsequently contacted the writer by telephone on June 24, 1982 and advised me that the environmental audit had been delayed until July 19-20, 1982. We agreed therefore, to meet with personnel from the Morenci facility and Occidental corporate staff on July,9, 1982 to discuss the requested studies. This agreement and our study requirements were confirmed by letter of June 29, 1982 from the District I office.

July 9, 1982

Linda Koivuniemi and I met with the following personnel from Occidental Chemical Corporation on this date:

John Kashner, Plant Manager, Morenci Richard Speed, Environmental Engineer, Morenci Mike McLain, Project Engineer, Morenci Robert Schuttler, Director, Environmental Health and Safety, Niagra Falls, N.Y.

Neither Lee Huffaker, Chemist, or Richard Fredrick, Production Superintendent, for Morenci were in attendance at this meeting.

Several items were discussed during our meeting. A summary of each major item follows:

PCB Sources - We verified with the company where we collected our May 18, 1982 samples.

The company is still unaware of any possible PCB sources on the site. Mr. Schuttler indicated that Occidental had collected a composite core of about the first six inches of soil depth in roughly the same area we collected our surface sample and found no detectable PCB. I stated that I did not see how this negated our data at all since their sample was from a different location and a vertical soil composite,

whereas our sample was scrappings of the organic layer on top of the concrete pad.

Site Clean up - The number six storage area clean up was completed by June 28, 1982. All on-site waste drums from all storage areas have now been either moved to inside storage or shipped off-site to Chemical Waste Management. The company has manifested 1300 drums for disposal. Of these, the company stated 400 to 500 drums were waste and the rest were bag house dust.

Company officials now indicate that the drum storage existed for about 18 months, placing the start of accumulation around January 1981. This is the third variation of an accumulation start date that the company has indicated.

The company agreed that a secure method of determining if a returned drum had been opened was necessary. They are working on devising a drum seal method for future shipments.

Bulk loading facility - The only materials that were bulk loaded into tank trucks were Bonderites. These materials would have contained metallic phosphate compounds. The hose drainage and wash out water from the bulk loading operation is the material discharged into the ground through the previously described stainless steel drum at the loading facility.

On-site organics would have been contained in various solvents and Bonderlub compoundings.

Hydrogeological and Bean Creek Studies - Although Mr. Kashner has implied all along that the Morenci plant supported our request for a groundwater study, Mr. Schuttler indicated that he did not feel that such a study was absolutely necessary. We showed him the pictures taken of the site and explained our concern relative to the leaky drums and the bulk loading facilities. Mr. Schuttler indicated he would reevaluate the need for a hydrogeological study and respond to us by August 4, 1982 as to the company position regarding this study.

Mr. Schuttler was concerned about the validity of sediment samples and interpretation of any resulting data from the requested Bean Creek study. He indicated that Occidental had been involved in similar requests at other facilities and the merit of the study was always questionable when it was completed. I volunteered that our Biology Section had been involved in numerous creek sediment studies and never seemed to have a problem collecting the samples or interpreting the resultant data. Finally, I volunteered that we would do the creek study and the company could do the groundwater study.

Linda requested the samples that the company saved for us from the fibre paks and stainless steel drum from area 6 (ref. June 22, 1982 inspection). The samples could not be located but the drum and fibre paks were still on-site. Linda accompanied Mr. Speed while company personnel collected new samples for us. The samples were transferred to the writer and were transported to the Environmental Services Laboratory for analysis. Custody was maintained on the samples. Sample locations and analytical results were as follows:

Sample XXI - brownish yellow liquid from 3/4 full fibre pak drum

Sample XX2 - brownish yellow liquid residue from second fibre pak drum that had been in area 6

Sample XX3 - liquid contained in drum marked "nitric acid"

| Parameter | <u>#1</u> | <u>#2</u> | <u>#3</u> | |
|--|-----------------------|---|-----------|--|
| Total Flouride (mg/l) | 7,000 | 5,200 | 1.7 | |
| pH (run w/pH paper) | 0.1 | 0.1 | 0.1 | |
| Cadmium (ug/l) | k20 | k20 | 60 | |
| Chromium (ug/l) | 21,000,000 | 21,000,000 | 9,000 | |
| Copper (ug/1) | 21,000 | 14,000 | 1,700 | |
| Nickel (ug/l) | 270 | 190 | 730 | |
| Lead (ug/l) | 75 | k50 | 190 | |
| Zinc (ug/l) | 720 | 1,300 | 3,000 | |
| PCB (ug/1) A-1242 | k5,000 | k5,000 | k5,000 | |
| A-1254 | k2,000 | k2,000 | k2,000 | |
| A-1260 | k2,000 | k2,000 | k2,000 | |
| Scan 1 (Purgeable Halocarbons) | ons-von v= | त्यम चल मच | NOS | |
| Scan 2 (Purgeable Aromatic Hydro | 0 | | NOS | |
| carbons) | •• | r i de la la la la la la la la la la la la la | ** | |
| Scan 4 (PCB and Organochlorine Pesticides) | Ü | U | Ü | |
| Note: k means less than | | | | |

Note: k means less than
U means undetected

NOS means "No sample received suitable for analysis requested"

In addition to the liquid samples, a sample of "bag house dust" was collected to verify its contents. The company stated the material should contain sodium metasilicate, sodium phosphate compounds, soda ash and possibly caustic. Analysis of the sample showed the following:

Total phosphate (mg/kg) - 120,000 NA Silicate (leach)(mg/kg) - 13,000 NA Cadmium (mg/kg) - k2 Chromium (mg/kg) - k5 Copper (mg/kg) - 1,800 Nickel (mg/kg) - 1,600 Lead (mg/kg) - 23 Zinc (mg/kg) 36

Note: k means less than

NA means "analytical method has not yet been approved by laboratory"

July 27, 1982

Jack Wuycheck and Dennis Swanson from the Biology Section met the writer in Morenci to do a stream study in Bean Creek. Sediment and water samples were collected upstream and downstream of Occidental Chemical. A report pertaining to this study is being complied by Jack Wuycheck.

While we were doing the study we noted two discharges from Occidental to the river and two sewage discharges from the Morenci system were noted. The north (upstream) discharge from Occidental changed colors several times while we observed it and collected samples. Color variations were grey, white, brownish and purple at various times.

After we collected our stream samples, we proceeded to Occidental Chemical and contacted Mssrs. Kashner and Fredrick about the discharge. We described the location where the pipe was entering the river and neither Mr. Kashner or Mr. Fredrick had any idea what the source could be. They were invited to go out and look at the discharge and we left the office and proceeded toward the creek. On the way, Mr. Fredrick disappeared to get a key for the gate that they forgot had to be opened. He joined us shortly afterward with a maintenance man with a drawing of part of the sewer system serving Occidental (see attachmentII). Although the drawing is no longer accurate relative to buildings shown and it is not to scale, it did show that the sewer system could by-pass to the Creek. We located IMH #106, opened the cover and discovered that the system was overflowing. The company then contacted Morenci DPW to have someone come out and stop the by-pass.

While we were waiting we pulled the adjoining cover and found the "regulator" chamber. The sewer system serving Occidental is part of the Village system, which is a combined sewer system. This particular "regulator" consisted of a slide-gate at the outfall end of the chamber with a two section low head dam/backwater gate arrangement on the west side of the chamber. We found a long metal pipe on the company property and tried to push the backwater gates shut but they would not stay closed. I noted that water was flowing through the slide-gate opening along only about 25% of the base. I stuck the pipe down along the gate base to see if it was blocked and dislodged a considerable amount of greyish colored sludge from in front of the gate. The flow immediately filled the whole gate base and the by-pass to the Creek stopped. Sludge similar in physical characteristics to that found in the gate chamber had also been noted previously at the outfall to Bean Creek.

Company personnel indicated that Morenci personnel routinely check the by-pass structures in the system following a heavy rainstorm. This was confirmed by the DPW person responding to the company's earlier telephone call. However, this by-pass and the two other by-passes on the same sewer system noted earlier, indicate that the Village surveillance, and company surveillance, of the sewer system may leave something to be desired since it had not rained for a couple weeks. During my discussion with Mr. Kashner, he indicated that Mr. Schuttler had contacted him and needed some more time prior to our previously proposed August 4, 1982 meeting. We agreed to wait until the report was available on our Bean Creek study, about 3-4 weeks, before meeting again.

Conclusions

- 1. The materials stored in the drum storage areas at Occidental Chemical Corporation in Morenci were in full or in part an "other waste material" as defined in section 261.2(b) of the Resource Conservation and Recovery Act (RCRA).
- The materials stored in the drum storage areas at Occidental Chemical Corporation in Morenci were in full or in part a "hazardous waste" based on the following:
 - a. Ignitability (ref. 261.21(a)(1)) The flash point of drum samples #1 and #3 collected on May 27, 1982 were less than 70°F and less than 40°F respectively. Any liquid waste with a flash point less than 140°F is considered ignitable.
 - b. Corrosivity (ref. 261.22(a)(1)) The regulations state that an aqueous solution that has a pH less than or equal to 2 or greater than or equal to 12.5 is considered to be corrosive. Drum samples #2 and #3 collected on May 27, 1982 showed a pH of 1 and 14 respectively. The pH of all three drum samples collected on July 9, 1982 was indicated as 0.1.
 - c. Listed waste under Subpart D (ref. 261.31) Sample #1 and #3 from May 27, 1982 showed a "mixture including ethyl benzene and xylenes" and a trace of xylene respectively. Both xylene and ethylbenzene are listed under F003 in section 261.31.
- 3. The surface samples collected in storage area #2, #3 and #6 on May 18, 1982 and June 22, 1982 coupled with our visual observations of the storage areas show that the company allowed the discharge of materials from the stored drums onto the ground surface, contrary to the provisions of the RCRA regulations and section 6(a) of Act 245, P.A.1929, as amended, in that there was no designed protection afforded to the groundwaters or surface waters of the state that would preclude runoff from these storage areas from contributing a substance which is or may become injurious to the beneficial uses and/or aquatic environment associated with those waters.

- 4. Our observations of the bulk loading facilities and the company reported practice of draining hoses into the ground via the previously mentioned stainless steel drum indicate that Occidental Chemical Corporation is in violation of section 6(a) of Act 245, P.A. 1929, as amended and also section 7(1) of Act 245, P.A. 1929, as amended, in that the company does not have a valid permit for this discharge.
- 5. Occidental Chemical Corporation is in violation of Part 5 of the General Rules of the Water Resources Commission in that they were storing materials contained on the Critical Materials Register without adquate emergency containment (R323.1158) and the company did not have a Pollution Incident Prevention Plan addressing these materials (R323.1162).

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